

DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare:

1. I am the appellant in this appeal and the defendant in the underlying Marin Superior Court action. I have personal knowledge of the facts set forth in this declaration and could competently testify thereto if called as a witness. I am making this declaration in support of an opposition to plaintiff and respondent Scientology's motion to dismiss the appeal and in support of a cross motion to stay enforcement of the judgment during the pendency of the appeal.

2. Scientology moves this Court to dismiss my appeal from the judgment it obtained against me and its permanent injunction filed October 17, 1995 (Exhibit C to Declaration of Andrew H. Wilson ("Wilson Dec") in support of Motion) on the ground that I have "been held to be in ongoing contempt of the very court order from which [I] seek[] to appeal, that [I am] a fugitive from that court order, and that a bench warrant has been issued by the Superior Court for [my] arrest pursuant to the order of contempt." (Motion, pl) Scientology's motion, memorandum of points and authorities and Mr. Wilson's declaration contain falsehoods.

3. Scientology states:

"Armstrong has willfully disobeyed the injunctive order from which he appeals and has been held in contempt for that disobedience." (Scientology's Memorandum of Points and Authorities ("Scn Memo"), pl)

This is false.

4. The contempt order, a true and correct copy of which is

appended hereto as Exhibit 1, states:

"ARMSTRONG willfully disobeyed the [October 17, 1995 Permanent Injunction] Order. On or about January 26, 1997, ARMSTRONG sent a document entitled DECLARATION OF GERALD ARMSTRONG to United States District Judge Ronald M. Whyte. Judge Whyte was at the time presiding over three cases in which plaintiff is [Scientology alter ego entity Religious Technology Center, Inc.] RTC. In the Declaration ARMSTRONG recites his understanding that he was prohibited from sending such a Declaration directly to litigants and states that he is instead sending it directly to Judge Whyte in the hopes of influencing his decision on a pending matter. This evidences ARMSTRONG'S disobedience of the Order and Judgment." (Ex. 1, 3:1-10)

5. Nowhere in the subject January 26, 1997 declaration, a true and correct copy of which is appended hereto as Exhibit 2, do I make the statements Scientology has included in its Order which Judge Thomas signed. I state in the January 26, 1997 declaration:

"This [October 17, 1995 Permanent Injunction] order does not, however, prohibit me from voluntarily assisting a person judging litigations involving the order's "beneficiaries." I believe that the United States District Court is a "governmental organ or entity" excluded from the prohibitions of the order. [Wilson Dec, Ex. C, 8:1,2,6,7] I am therefore providing the original of this declaration to the Court."

6. The Injunction specifically permits me to "[v]oluntarily assist[] any [] governmental organ or entity [] regarding [Scientology, its claims and claims against it]." (Wilson Dec, Ex. C, 7:4-7; 8:1-7). My reasoning for the legality of my sending the declaration to Judge Whyte is that if the Marin Superior Court's Order prohibits me from "voluntarily assisting," or freely communicating to, governmental organs or entities about Scientology, I would not be permitted to report, e.g., murder. Such an interpretation must create a terrible illegality and a public wrong. Scientology is widely known as a dangerous and criminal cult, and I believe everyone, for individual and the common safety, must be free to communicate its dangers and criminality.

7. My January 26, 1997 declaration was the reporting of another crime by Scientology, namely obstruction of justice through its attempt to intimidate me, a subpoenaed witness, into not obeying the subpoena. I believe that it was completely legal, probably a civic duty, and certainly not prohibited by the Permanent Injunction, to bring the obstruction of justice, and the facts underlying and surrounding it, to the attention of Judge Whyte who presided over the case in which the obstruction of justice occurred.

8. On January 23, 1997 I received a subpoena, a true and correct copy of which is appended hereto as Exhibit 3, from Grady Ward in the case of RTC v. Ward, US District Court for the Northern District of California, case no. C-96-20207 RMW. Mr. Ward's subpoena states:

"You are commanded to produce and permit inspection and copying of the following documents or objects []:

All documents and declarations authored by yourself documenting abuse, fraud, and unlawful acts by the Church of Scientology Enterprise or any of its

investigators, such as Eugene Martin Ingram." (Ex. 3)

See also Ex. 2 hereto, 43:13-15. In response to Mr. Ward's subpoena I produced my January 26, 1997 declaration and the exhibits thereto. (Ex. 2)

9. On January 24, 1997 I received by fax a letter, a true and correct copy of which is appended hereto as Exhibit 4, from Scientology attorney Andrew H. Wilson, threatening prosecution in the Superior Court if I provide the documents to Mr. Ward as subpoenaed. Mr. Wilson's statement in the second paragraph that my "obligation to produce documents in response to lawfully issued and served subpoena is unquestioned" I took to be an effort to give plausible deniability to the threat and the clear obstruction of justice contained in the rest of the letter. I understood Mr. Wilson to be saying for Scientology, "We know you have a legal right to produce the subpoenaed documents, but we're going to prosecute you anyway." See also Ex. 2 hereto, 43:16-22.

In response to Mr. Wilson's threat I sent the declaration I had been ordered to produce by Mr. Ward to Judge Whyte, who, I believed, and still believe, is the proper person to be advised of and curtail Scientology's interference with a witness in the cases before him.

10. Mr. Ward's subpoena to me commanding the production of declarations and other documents concerning Scientology private investigator Ingram was relevant because Mr. Ingram had orchestrated or participated in a number of crimes or intelligence operations against me; e.g., threatening to put a

bullet between my eyes; illegally videotaping me; attempted entrapment; worldwide character assassination, which Scientology calls "black propaganda" or "black PR;" and harassment of my friends. He had also orchestrated or participated in a number of crimes or intelligence operations against my attorney Michael Flynn; e.g., framing him with forgery of a \$2,000,000 check; and my attorney Ford Greene; e.g., planting a spy in his office to copy and/or steal his files; filing false bar complaints; harassing his friends. I understand that Mr. Ward was also the target of crimes or intelligence ops orchestrated or participated in by Mr. Ingram, and that Mr. Ward was seeking information in order to have Scientology and Ingram desist in such crimes or ops.

11. The Order of Contempt signed by Judge Thomas states:

The injunction "prohibited ARMSTRONG from voluntarily assisting any person arbitrating or litigating adversely to the Beneficiaries and also prohibited ARMSTRONG from facilitating in any manner the creation, publication, broadcast, writing, electronic recording or reproduction of various documentary works. There is no suggestion, and certainly no showing by ARMSTRONG, that he is incapable of complying with the Order." (Ex. 1, 2:20-26)

This is untrue for three reasons. I was subpoenaed and did not "voluntarily" produce the documents I produced. I was reporting the criminal offense of obstruction of justice. I was doing what every citizen should do: oppose injustice. I have stated over and over, since 1990, and remain even more convinced today, that it is wrong, illegal and dangerous for any entity, but

particularly an organization such as Scientology, to be able to say whatever it wants about anyone, including me, and the target of those statements, including me, be unable to respond; and further, if he does respond, to be subject to fines and imprisonment. To not respond, then, is, because of that wrong, illegality and danger, for moral, ethical, legal and religious reasons, no matter what penalty injustice may impose, for me, impossible.

12. Although it is correct to say that Judge Thomas signed Scientology's document which states that I willfully disobeyed the Order, it is false to say that I have willfully disobeyed the injunctive order from which I appeal and have been held in contempt for that disobedience." I was permitted by the Order to send Judge Whyte the declaration, and I had been subpoenaed.

13. Scientology states:

"Rather than discharging the contempt order of the Superior Court, or properly noticing a timely appeal from it, Armstrong fled the United States....The appeal should therefore be dismissed." (Scn Memo. p.1)

This is false.

14. I left the United States in February, 1997. Scientology obtained its contempt order in June. (Ex. 1 hereto)

15. Mr. Wilson states:

"Accordingly CSI moved for an Order to Show Cause why Armstrong should not be held in contempt of court for [sending the declaration to Judge Whyte]. Rather than responding to the OSC Armstrong fled the country... Armstrong's flight required that we serve the Order to Show Cause by publication." (Wilson Dec, p6, ¶11)

This is false.

16. Accepting Mr. Wilson's own representation, he called my former residence in San Anselmo, California to give notice of his ex parte application for the OSC on February 14, 1997. (See Wilson letter, Ex. 11 hereto) I had left that residence on January 28, 1997 and was already in Canada on February 11. Appended hereto as Exhibit 5 is a true and correct copy of my boarding pass from that date.

17. I left the US, not because of Scientology's OSC or its contempt order, but because of this organization's unceasing threats and attacks and my need to be in a position to oppose those threats and attacks, for my own safety and for the safety of countless other people attacked and victimized by the organization.

18. I have been for many years and am now the target of Scientology's notorious "Fair Game" policy concocted and named by organization founder L. Ron Hubbard, which states in one of its forms that "enemies" may be tricked, cheated, lied to, stolen from and destroyed without discipline to the perpetrator. In another form, which along with the above description is used and defended by Scientology as "scripture," Hubbard writes:

"The law can be used very easily to harass, and enough harassment on somebody who is simply on the thin edge anyway, well knowing that he is not authorized, will generally be sufficient to cause his professional decease. If possible, of course, ruin him utterly."

These are widely known writings, and Scientology does not deny their authenticity. I can provide these and other policies providing instruction on the Scientology organization's

aggressive and dangerous nature and activities if this Court so desires. On information and belief, many judges in this state, and probably across the United States, have an awareness already of Scientology's use of the law for impermissible purposes.

19. I have been assaulted, spied on, run into bodily with a car, threatened with murder, illegally videotaped, and harassed in many other ways by agents of Scientology. Organization agents have stolen legal documents and art from me, sued me five times, filed countless false sworn statements about me, attempted to involve me in a freeway accident, and attempted at least thirteen times to have me jailed on false charges. The organization has carried out fair game campaigns against my attorneys Michael Flynn and Ford Greene. It has carried out an international campaign to destroy my credibility and reputation pursuant to its policy and practice of black PR, which is another form and facet of fair game.

20. Scientology obtained my signature on its "settlement agreement," the judicial enforcement of which led to the Judgment from which I am appealing, by fraud, duress and the compromise of my attorney Michael Flynn through a concerted campaign subjecting him to years of fair game. I have provided a wealth of evidence concerning the circumstances at the time of the 1986 "settlement" and this fraud, duress and attorney compromise in the record on appeal, and cited to that evidence in my opening brief, a true and correct copy of the relevant pages from which is appended hereto as Exhibit 6.

21. Scientology brought me back into its conflict and brought me to speak out against its tortious and criminal practices because of its black PRing and threatening me after the

"settlement." I have provided in the record on appeal evidence concerning Scientology's attacks and threats following the "settlement" and before I responded, and cited to that evidence in my opening brief, a true and correct copy of the relevant pages from which is appended hereto as Exhibit 7.

22. Scientology continued to fair game me after it commenced its judicial enforcement of the "settlement agreement." I have provided in the record on appeal evidence concerning Scientology's attacks and threats during that period up to its obtaining the judgment from which this appeal is taken, and cited to that evidence in my opening brief, a true and correct copy of the relevant pages from which is appended hereto as Exhibit 8.

23. Following its obtaining the "permanent injunction" and "judgment" against me, Scientology has continued up to the present to fair game, black PR and threaten me. It is these attacks and threats, all generated by the Scientology organization, which brought me to leave California and go to Canada where for a period of time I would be able to counter the threats and attacks.

24. Appended hereto as Exhibit 9 is a true and correct copy of two documents I received in late November, 1996 from Craig Branch of the Watchman Fellowship, a Christian research and apologetics organization and publisher. The first is a letter dated October 21, 1996 from Cathy Norman of Scientology's Office of Special Affairs ("OSA") in Austin, Texas. OSA is the internal branch of the Scientology enterprise which carries out its legal and extra-legal attacks on the organization's targeted "enemies."

The second document is black PR on me given a date of May 10, 1993 generated by OSA in its central office, directed by David

Miscavige, who holds other designations such as "leader," "Chairman," "ecclesiastical head" and "DM," and who is personally, just as Hubbard was before him, responsible for his organization's black PR and all its fair game. The 1993 black PR is factually false and presents a false and degrading picture of me. It is similar to a mountain of black PR Scientology disseminated about me prior to the "injunction." Ms. Norman states in her letter that she also provided the black PR document to one James Walker, of the Texas branch of Watchman Fellowship.

25. Appended hereto as Exhibit 10 is a true and correct copy of a letter dated February 12, 1997 from my attorney George W. Abbott to Ms. Norman, David Miscavige, and corporate entities RTC and CSI, the latter being plaintiff and respondent herein. In his letter on my behalf Mr. Abbott demands a retraction and payment of damages. Mr. Abbott also states:

"I have advised Mr. Armstrong that he is free to communicate orally, in writing or by any other legal medium available to him to fully correct the lies and distortions in your letter and dead agent document. I have advised him that he is free to communicate to anyone he believes may have been or may be exposed to this black PR, and that he is free to explain why Scientology and its leaders have created and distributed these documents.

I have further advised Mr. Armstrong that Scientology cannot legally prevent him from correcting this libel with threatened enforcement of your organization's "settlement agreement" of December, 1986. Each moment you and your seniors prevent him

from telling the truth to whomever he chooses in rejection of your documents' attack on his character you are increasing his damages." (Ex.10, p2,3)

26. Appended hereto as Exhibit 11 is a true and correct copy of a letter dated February 25, 1997 from attorney Wilson to Mr. Abbott refusing to retract the libel and rejecting the demand. In his letter, Mr. Wilson states:

"[Armstrong] is [not] free to communicate orally, in writing or by any other legal means available to him to fully correct... alleged lies and distortions." (Ex. 11, p1, ¶3)

27. Instead of responding responsibly to the presentation of serious charges of a personal and defamatory attack on me, Mr. Wilson forwards Scientology's black PR attack:

"It is apparent to me that you and Mr. Armstrong are colluding to create a defense to a charge of contempt against Mr. Armstrong, as evidenced by your statement that you have advised Mr. Armstrong that he is free to communicate with anyone to correct lies which have been told about him. Before you provide Mr. Armstrong with such a purported "advice of counsel" defense, you should carefully consider whether you have a reasonable basis for such advice, whether you are subjecting yourself to liability for your uninformed advice or, even worse, for your collusion with Armstrong to avoid the Court's directive, and whether you are ultimately willing to be yet another victim of Mr. Armstrong's pathology." (Ex. 11, p2, ¶4)

28. Mr. Wilson also states:

"Mr. Armstrong will never be able to prove defamation.

I have reviewed the documents which you allege are defamatory and am unable to find any statement concerning Mr. Armstrong, much less one which is defamatory." (Ex. 11, p1, ¶4)

Mr. Wilson is forwarding a lie. The name "Armstrong," referring to me, occurs in the 1993 document 83 times, and each of its 8 pages and 27 paragraphs concerns me personally.

29. In January this year I came across the internet site of a Maureen Garde which contained part of Scientology's IRS Form 1023 responses to questions asked of the organization by the IRS when dealing with its application for tax exemption. I discovered a section in the webbed 1023 submission, which Scientology had filed in 1991 or 1992, containing the same sort of black PR on me as is contained in other black PR the organization has published about me. A true and correct copy of part of the 1023 submission, which I downloaded off the internet and printed, is appended hereto as Exhibit 12. Scientology's statements about me and my earlier litigation, Los Angeles Superior Court Case No. C 420153, are in fact and conclusion false. The decision of Judge Paul G. Breckenridge, Jr. in that case was affirmed on appeal, Scientology v. Armstrong, (1991), 232 Cal.App.3rd 1060, 283 Cal.Rptr. 917. Scientology was granted tax exemption by the IRS in 1993 on the basis of this false submission. Scientology submitted these false statements to the IRS during a time the organization was attempting to judicially and extrajudicially silence me and thus prevent me from responding to its falsehoods. The importance of my earlier litigation and testimony to the IRS in its denial of

Scientology's tax exemption is shown by Scientology's statements in the 1023 response:

"the Service has continuously thrust the **Armstrong** case at us, demanding an explanation." (Ex.12, p1)

"The IRS CID, however, absorbed Breckenridge's findings as the definitive statement of what Scientology is, and used this decision and the Flynn witnesses who testified at the trial as the nucleus of their investigation." (Ex. 12, p4)

30. The depth of Scientology's black PRing of me in its submission to the IRS is shown by its statement:

"As we shall demonstrate below, all this decision ever involved was **Armstrong's** state of mind, which subsequently obtained evidence proved conclusively to be one sordid, sado-masochistic nightmare. Furthermore, **Armstrong's** state of mind horror stories have fallen on deaf ears in recent litigation. Relying on **Armstrong** or the **Armstrong** decision is wholly unjustified." (Ex. 12, p1)

31. On information and belief, Scientology makes this 1023 submission publicly available at all of its branches. This document continues to be available on the internet for the whole world to see at <http://superlink.net/user/mgarde/irs1023.htm>.

32. I believe that Scientology will do anything to silence me completely and forever. I also believe that Scientology's false submission to the IRS and its obtaining of its tax exemption based thereon constitutes a massive fraud upon the people of not only the US but the world. I therefore had to leave the US, where Scientology could prevent me from correcting

this fraud, and have me harmed in many ways to so prevent me, to be in a country where I have legal protection from Scientology's abuse of the justice system and where I could work to correct its fraud.

33. Although Scientology possessed both the 1993 black PR sent to Watchman Fellowship principals Branch and Walker and the IRS form 1023 black PR on me during the discovery phase of this case in the Court below, and although both documents were of a type and nature of document Scientology was ordered to produce to me during discovery, Scientology did not produce these documents.

34. While I was in Germany in October this year, at the invitation of a Christian group who also paid my expenses, to discuss, inter alia, Scientology's obtaining its IRS tax exemption by fraud and its "religious" persecution of innocent people, Scientology agents passed out copies of a black PR document on me, a copy of which, along with an English translation, is appended hereto as Exhibit 13. This black PR is based on false statements about me attributed to Scientology attorney Elliot Abelson who has his office in Los Angeles, California. On information and belief, this black PR document was also provided by Scientology to German media persons, and at least one newspaper used the information contained in the document in a published article.

35. Approximately three months ago I was advised by a Canadian radio journalist in Edmonton, Alberta that Scientology OSA agent Yvette Shank provided her with a pack of documents concerning me, which, on information and belief, is black PR.

36. Approximately two months ago I was contacted by a British television journalist and advised that Scientology

director and OSA agent Lynn Farny provided British Television Channel 4 with a letter and a pack of documents concerning me, which, on information and belief, is black PR.

37. Over the past two years I have also been the target of a number of black PR attacks by Scientology agents on the internet newsgroup alt.religion.scientology, ("ARS"), and on various Scientology internet sites.

38. Appended hereto as Exhibit 14 is a true and correct copy of a complaint for defamation and intentional infliction of emotional distress, Gerald Armstrong v. David Miscavige, et al., US District Court, District of Nevada, Case No. CV-N-00670-ECR (RAM), filed November 24, 1997. This lawsuit flows from David Miscavige and his Scientology organization's manufacture and dissemination of the black PR publications forming Exhibit 9 hereto, received by me in November, 1996.

39. Appended hereto as Exhibit 15 is a true and correct copy of my letter of March 6, 1997 to David Miscavige requesting a meeting with him in order to correct the falsehoods in his organization's 1023 submission and hopefully bring about other reforms in Scientology, and laying out a program I intend to follow if he refused to meet and correct the record.

40. Appended hereto as Exhibit 16 is a true and correct copy of two letters dated March 25, 1997 and May 5, 1997 to Mr. Miscavige from George Abbott. The March 25 letter accompanied my March 6 letter to Mr. Miscavige. These two letters were refused by Mr. Miscavige and RTC and returned by the postal service. The May 5 letter was faxed to Mr. Miscavige at RTC, along with the March 6 and March 25 letters.

41. Appended hereto as Exhibit 17 is a true and correct

copy of a letter dated May 8, 1997 to Mr. Abbott from attorney Andrew Wilson, who rejects on behalf of Mr. Miscavige my proposal to meet and correct Scientology's falsehoods.

42. Appended hereto as Exhibit 18 is a true and correct copy of a letter dated November 27, 1997 from Mr. Wilson to me received by me December 1, stating:

"I write to apprise you that I shall appear December 2 at 9:30 a.m. before the Hon. Gary Thomas in Courtroom H of the Marin County Superior Court to seek an order to show cause re contempt arising out of your recent actions in creating and publishing certain documentary works over the internet, in granting interviews to various English and German media and other actions taken by you while in Germany." (Ex. 18)

43. Later on December 1 I posted to ARS a message, a true and correct copy of which is appended hereto as Exhibit 19, in which I stated that "I can't make the 0930 appearance."

44. On December 4, a Scientology process server attempted to serve me in the office of Mr. Abbott, who represents me in the Armstrong v. Miscavige, US District Court case, supra (Ex.14), with what I understand to be an OSC issued by the Marin Superior Court. I advised the process server, who spoke with me by phone from Mr. Abbott's office that I would be in Mr. Abbott's office within two weeks and would at that time accept service of whatever she had.

45. Also on December 4 I posted to ARS a message, a true and correct copy of which is appended hereto as Exhibit 20, specifically directed to the Scientology organization, in which I stated:

"I explained to [the process server/agent] that I expect to be in Mr. Abbott's office within two weeks, and that when I know that I will be there I will call her number and she can come by to serve me." (Ex. 20)

I also stated in the December 4 post:

"If I don't show up within 2 weeks, and don't accept service of your papers in Mr. Abbott's office within 2 weeks, you can go wherever you want to serve me." (Ex. 20)

46. On December 5 I also called Mr. Wilson's office and left a voice mail message, providing generally the same information as in my December 4 post, and advising Mr. Wilson specifically that I expected to be in Mr. Abbott's office within two weeks and would accept service at that time of whatever the Scientology organization wanted to serve on me. I am at this time in the process of moving to my new residence in Nevada.

47. Appended hereto as Exhibit 21 is a true and correct copy of my letter of October 18, 1997 to the [Congressional] Commission on Security and Cooperation in Europe regarding "Religious Intolerance in Europe: the Scientology connection." This letter discusses my Scientology experiences and knowledge and criticizes Scientology's abuse of people and abuse of the justice system, including abuse in the matters before this Court. In addition to mailing the letter to the CSCE, I posted it to ARS and have provided it to many people for further free distribution.

48. Appended hereto as Exhibit 22 is a true and correct copy, as downloaded from US Government documents internet site <http://thomas.loc.gov/r105/r105d09no7.html>, of the November 9,

1997 Congressional Record concerning H. Con. Res. 22, a proposed resolution to condemn Germany for its government's actions and policies regarding the Scientology's organization.

49. Appended hereto as Exhibit 23 is a true and correct copy of a letter delivered by me on December 5, 1997 to the United States Consulate General in Vancouver, B.C., Canada, and to the Vancouver Sun and Vancouver Province newspapers. This letter, or a similar version to this, was delivered by people protesting the Scientology organization's violations of human rights to US consulates and embassies and US Federal buildings in various places around the world on December 5. Also forming part of Exhibit 23 is a copy of an updated list of signatories to the letter.

50. Appended hereto as Exhibit 24 is a true and correct copy of a study entitled "Brainwashing in Scientology's Rehabilitation Project Force (RPF)" presented at the Society for the Scientific Study of Religion in San Diego, California November 7, 1997 by Stephen A. Kent, Ph.D., Department of Sociology, University of Alberta, Canada. This study cites to an affidavit executed by me in 1982, and to a post I made to ARS a few months ago. (See, e.g., Ex. 24, Bibliography, p. 32) I was in the RPF, Scientology's penal camp, on two occasions for a total of 25 months.

51. Appended hereto as Exhibit 25 is a true and correct copy of the decision of Judge Paul G. Breckenridge, Jr in the case of Scientology v. Armstrong, Los Angeles Superior Court Case No. C 420153 filed June 22, 1984. This decision was affirmed on appeal, Scientology v. Armstrong, 232 Cal.App.3d 1060, 283 Cal. Rptr. 917.

52. Appended hereto as Exhibit 26 is a true and correct copy of a number of messages, the pages of which I have hand-numbered "1" - "60", posted to the ARS newsgroup by me and others during the period of June to December, 1997. My participation in the discussions shown in these posts is representative of my participation in ARS since I began to participate in June this year. I have made approximately 200 posts to ARS in that time, and my name has appeared or my experiences discussed on the ARS newsgroup perhaps two thousand times.

53. ARS is a cyberspace message center and meeting place for people who seek an end to Scientology's fair game doctrine, and who derive a certain amount of safety from fair game attacks by meeting, communicating and reading others' communications on the newsgroup. ARS is free to everyone, and no one is barred from participating, including Scientologists and Scientology agents, who participate for the most part by practicing fair game against the people dedicated to ARS's goal of ending that practice, and ending the threat it is to so many. Participation in ARS is by posting to the newsgroup messages relating to Scientology. Much of the information provided by participants makes its way onto "permanent" web sites or is otherwise "permanently" archived. A number of ARS participants are defendants, some like myself in propria persona, in Scientology litigations.

54. Many documents filed in Scientology litigations around the world are posted to ARS, often the day they are filed in court. In this appeal, I posted my Appellant's Opening Brief filed in August this year, and there was some subsequent discussion on the newsgroup of certain sections or facts from the brief. The instant document, for example, I will also post at

some point. I have found that all the work of preparing documents and making them public is one of the prices for finding relative safety through faith in free speech and the efficacy of getting the word out. What flows on ARS's field of free speech is the participants' knowledge of and experiences with Scientology's nature and activities, past and present, and the participants' on-going experience of participation. Since I have had a very long and intense experience with Scientology and continue to have a very time-consuming, full-time and threatening legal, extralegal and psychological relationship with the organization, and its leader David Miscavige, I have potentially a great deal to give to and receive from participation in ARS. Some people post anonymously; some post openly, using their real names, as I do. Posts to ARS have averaged some 300 per day for the past few years. ARS has no organization, but is sometimes used for organizing the unorganized participants. One of its main organizing activities is the present, continuing and global picketing of the Scientology organization protesting its human rights abuses. I participate in these pickets as circumstances permit.

55. Exhibit 26, pp1-2, dated 6/25/97, is my response to attorney Ford Greene and ARS participant Jim Byrd's posts re Scientology's Contempt Order (Ex. 1 hereto).

56. Exhibit 26, pp3-4, dated 7/13/97, is my response to ARS participant Anonymous's post re Scientology's claim of raising IQ.

57. Exhibit 26, p5, dated 7/19/97, is my response to Garry Scarff's post threatening:

"Word has it that the motions are in place to ferret

Mr. Armstrong back to the United State, involuntarily if necessary, to answer to federal charges of elluding U.S.laws." (Ex. 26, p5)

As I stated in the response, Mr. Scarff has testified that he was involved with Scientology agents in assassination plots, and he was claiming during the period in which he made the above-quoted threat that he was then meeting with Scientologists.

58. Exhibit 26, pp6-8, dated 7/23/97, is my response to a posted question from Scientology agent Keith Wyatt who asks:

"I want to read your whole side of the story from start to finish. Why do you feel you have been unfairly and unjustly treated?" (Ex. 26, p6)

My answer contains an analysis of the basic issue in this appeal, and a statement of why I have been in Canada:

"But what if I were the last person on earth who had the knowledge I have; or what if I were the last person on earth who had a key.....

That is why I am in Canada, and that is why I will say what I'm called to say. To do otherwise is unfair and unjust." (Ex. 26, pp7,8)

59. Exhibit 26, p9, dated 7/7/97, is my post re an L. Ron Hubbard statement on Scientology brainwashing.

60. Exhibit 26, pp10,11, dated 9/1/97, is my response to a question posted by ARS participant Tilman Hausherr who asks:

"Can you tell us more about this? I would like to hear the name of these people." (Ex. 26, p10)

Mr. Hausherr was asking about a quote from my opening brief filed herein:

"also hired individuals who followed and surveilled GA,

assaulted him, struck him bodily with a car, and attempted to involve him in a freeway accident." (AOB p5; also Exhibit 25, Appendix 14:22-15:3)

61. Exhibit 26, pp12,13 dated 9/24/97, is my response to ARS participant Robert Vaughn Young re RPF and RPF's RPF. This post is cited to by Dr. Kent in his sociological study of the RPF. (Ex. 24 hereto.)

62. Exhibit 26, p14, dated 9/15/97, is my post re the organization-wide phenomenon of lying in Scientology.

63. Exhibit 26, pp15-17, dated 11/18/97, is my response to Tilman Hausherr's post re an often-repeated Scientology black PR charge that I had posed "nude" for a newspaper.

64. Exhibit 26, p18, dated 11/7/97, is my response to Tilman Hausherr's post re liquidated damages penalties in the case underlying this appeal.

65. Exhibit 26, pp19-22, dated 11/6/97, is my response to ARS participants Jens Tingleff and Tilman Hausherr re an art project of mine.

66. Exhibit 26, pp23,24, dated 11/5/97, is my post of a translation of black PR on me distributed by Scientology in Germany (Ex. 13 hereto). Scientology makes the charge:

"Mr. Armstrong, the so-called "Scientology Expert," was found guilty of contempt of court. When he was ordered to report to jail he fled the USA and is hiding in Canada. He stated in court that he normally converses with the dead." (Ex. 26, p23)

I state in response:

"I didn't leave the US when I was ordered to report to jail. I left when I discovered that the cult's leaders

figure the tax exempt status and their billions of dirty dollars depend on silencing me. I left in February, 1997, in order to be free to correct this tax fraud and other Scientology abuses. The cult got its order sending me to jail in June, 1997." (Ex. 26, p24)

67. Exhibit 26, pp25-36, dated 11/8/97, is my post of a letter dated December 22, 1992 to David Miscavige, along with a discussion of Scientology's use of the letter for liquidated damages purposes and as a basis to obtain an OSC re contempt against me.

68. Exhibit 26, pp37-40, dated 11/11/97, is my response to posts of Garry Scarff and a Scientology agent using the name "RonsAmigo." RonsAmigo forwards Scientology black PR:

"...Gerry? I think that your primary background is that of an an anti-Scientology legal-whore working for shyster lawyers and that's all that gives your miserable life any meaning." (Ex. 26, p38)

69. Exhibit 26, pp41-45, dated 11/13/97, is my post re Scientology's use of my recitation of a dream to black PR me.

70. Exhibit 26, p46, dated 11/14/97, is my response to posts by ARS participants Ray Randolph and Grady Ward re Scientology's fair game operation against cartoonist Jim Berry.

71. Exhibit 26, pp47,48, dated 11/27/97, is my response to posts by ARS participants Ralph Hilton, Paul B, and Tilman Hausherr re Scientology practices of "dead agenting" and "black PR."

72. Exhibit 26, p49, dated 11/18/97, is my response to a post by Scientology agent RonsAmigo re payments to people litigating against Scientology. I am one of the people litigating

against Scientology, who has depended at times, for basic survival and the wherewithal to fight this battle, upon loans or donations from various supporters.

73. Exhibit 26, pp50,51, dated 12/9/97, is a post by ARS participant Rod Keller of an editorial of that date in the St. Petersburg (Florida) Times. The editorial states:

"The actions by Scientology officials last week dragged the city back to a time when the church used confrontation and reckless allegation to silence those who disagreed with it. Whatever accommodation Scientologists had gained in the community, it has been damaged by their latest behavior." (Ex. 26, p50)

74. Exhibit 26, pp52,53, dated 12/10/97, is a post by ARS participant Anti-Cult (Sten-Arne Zerpe) in response to posts by ARS participants Ted Mayett and Mark Dallara. Mr. Zerpe states:

"Nobody in this NG, should live with the illusion that scientology will die silent, no on the contrary they will do whatever they can to stop their own death.

"That means that they would even hire contract killers to kill critics if the[y] must. After all, they do believe that they are under attack from an alien intergalactic fleet. Do not ever forget that. The organization that we oppose here, is totally insane. Their leaders would all qualify for the Hitler of the year award if there was any. The first winner would of course be Hubbard himself. When this criminal organization in the end comes crashing down, I think that the leaders would fit much better in a mental institution than in a jail." (Ex. 26, p52)

75. Exhibit 26, pp54-59, dated 12/10/97, is a post by ARS participant Chris Sutor in response to a post by Scientology agent Keith Wyatt. In responding to Mr. Wyatt's assertion that "critics are making a mountain of a mole hill," Chris Sutor asks:

"Mole hills like murder, government infiltration, imprisonment, torture, attempted fraud, wasting the time of the american court system, and forcing people to commit suicide?" (Ex. 26, p56)

76. Exhibit 26, p60, dated 12/10/97, is a response by ARS participant Joel Hanes to a post by ARS participant Michael Reuss. Mr. Reuss writes:

"[Someone leaving Scientology] will have ceased to be a Scientologist. Then who knows, maybe later he'll come back to a.r.s and post a nice affidavit. He'll take his rightful place alongside Gerry Armstrong, Robert Young, Dennis Erlich, Arnie Lerma, Bob Penny, and Larry Wollersheim. Yeah, that's what I'd like to see..." (Ex. 26, p60)

Mr. Hanes responds:

"In fact, this is my Christmas wish to and for \$cientologists everywhere: that the scales fall from their eyes, that they wake up to the ways in which they are and have been systematically exploited, lied to, manipulated, and bilked of their money, time and energy, and that they quietly blow the cult." (Ex. 26, p60)

To "blow the cult" means in Scientologese "to leave Scientology."

77. Appended hereto as Exhibit 27 is a true and correct copy of a letter dated December 12, 1997 from Andrew Wilson to

George Abbott regarding the Armstrong v. Miscavige, US District Court case, supra (Ex.14). Mr. Wilson states:

"Perhaps the most egregious aspect of your complaint (sic) is that it revisits and attempts to recover for a "fifteen year[s]...course of conduct designed to destroy plaintiff Gerald Armstrong." I am flabbergasted that you could contend this in the face of the Settlement Agreement of December 1986, which expressly released all claims and which provided that the "slate was wiped clean." You should review the cross complaint filed by Mr. Armstrong in Church of Scientology International v. Gerald Armstrong, Marin County Superior Court Action No. 157680. That cross-complaint is based on facts virtually identical to those asserted in your complaint, and was disposed of on summary adjudication, thus barring future assertion of any claims arising out of the same set of facts under the principals (sic) of res judicata and collateral estoppel with which I assume you are familiar." (Ex. 27, p2)

78. Appended hereto as Exhibit 28 is a true and correct copy of a letter dated December 17, 1997 from George Abbott to Andrew Wilson in response to Mr. Wilson's December 12 letter. Mr. Abbott states:

"As you know, Mr. Armstrong received your clients' defamatory documents in late November, 1996, and these documents were disseminated by your clients only a little more than a month earlier. The cross-complaint was filed years earlier. The principles of res judicata

and collateral estoppel are therefore inapplicable. If, however, you have facts to support your assertion that these principles do apply in this defamation case, I am interested in examining them." (Ex.28, p2)

79. Mr. Abbott also states:

"Mr. Armstrong left California early this year because of threats from the Scientology organization and his need to have some measure of safety from those threats. Because his movements since leaving California have been brought about by their own unlawful actions, Scientology's principals and agents have no legal or moral basis for complaining about where Mr. Armstrong resides. He has been for some considerable time a resident of Nevada." (Ex.28, p1)

80. Appended hereto as Exhibit 29, is a true and correct copy of Scientology's ex parte application for an order to show cause why I should not be held in contempt, the declaration of Andrew H. Wilson in support thereof, and an order to show cause re contempt signed December 2, 1997 by Marin Superior Court Judge Gary W. Thomas, and received by me December 17. I have hand-numbered the pages of this set of documents "1" - "100."

Scientology's application is based on a number of falsehoods.

81. In his OSC application declaration ("Wilson OSC Dec, Ex. 29") Mr. Wilson states:

"In December, 1986, Armstrong entered into a Mutual Release of All Claims and Settlement Agreement [] pursuant to which CSI paid Armstrong \$800,000.00."

(Wilson OSC Dec, Ex. 29, 14:25,26)

This is false. Scientology paid a lump sum to my attorney Michael

Flynn to settle a number of claims against the organization. The amount paid by Mr. Flynn to each of his clients was confidential between them, and unknown to Scientology. The amount paid to me to settle my lawsuit against Scientology, since that amount could have been \$0.01, is thus irrelevant.

82. In his OSC application declaration Mr. Wilson states:
"beginning in approximately 1990, Armstrong fraudulently transferred substantially all his assets and began repeatedly breaching almost every covenant he made in the Agreement." (Wilson OSC Dec, Ex. 29, 15:3-5)

This is false. My 1990 renunciation was not fraudulent and had nothing to do with Scientology. (See AOB, p17) The only "breach" of the "settlement agreement" in 1990 is my petition to the Second District Court of Appeal for permission to respond in Scientology's appeal from the 1984 decision (Ex. 25 hereto) in Scientology v. Armstrong, LASC No. 420153. The Court of Appeal granted my permission, thus there was no "breach." (See AOB, pp12-14) The later "breaches" were unrelated to my renunciation, but directly related and in response to Scientology's breach of the covenants of good faith and fair dealing by continuing to attack me after the "settlement."

83. In his OSC application declaration Mr. Wilson states:
"Less than a month later (after late May, 1992), I was questioning Mr. Armstrong at a deposition when he testified of his intention to ignore the settlement agreement and Judge Sohigian's Order:" (Wilson OSC Dec, Ex. 29, 15:10-17)

This is false. Mr. Wilson asked me in deposition about the

settlement agreement, not the order of Judge Sohigian. Mr. Wilson attaches page 124 of that deposition transcript wherein I respond about the "settlement agreement" (Ex. 29, pp21,22), but fails to attach page 123 where he asks about it. In his declaration in support of Scientology's motion to dismiss this appeal, Mr. Wilson states that he "questioned [me] [only] as to whether [I] intended to obey the [May, 1992] order of Judge Sohigian." (Wilson Dec, p2, ¶4)

84. Following that June, 1992 deposition, it came to light that Scientology over the years following the 1986 "settlement" and throughout the post-settlement litigation had been carrying out a black PR campaign against me far more massive than then imagined, publishing and disseminating a paper mountain of lies about me. That fact, in addition to Scientology's litigation attacks and extralegal threats, to say nothing of its efforts to deny me basic Constitutional rights, made "honoring" the "settlement agreement," as I stated in deposition, unsafe, unwise and logically, ethically, morally, psychically, philosophically, spiritually, and in any other way, impossible.

85. In his OSC application declaration Mr. Wilson states:

"While the preliminary injunction which preceded the Order was in effect, Armstrong willfully disobeyed it on numerous occasions. This gave rise to an earlier Order to Show Cause Re Contempt, which was heard in December 1994 by the Honorable Diane Wayne. I represented CSI at that hearing. Armstrong admitted the violations and pled for mercy from the court. Judge Wayne discharged the contempt but admonished Armstrong to conduct himself appropriately in the future."

(Wilson OSC Dec, Ex. 29, 16:23-28)

This statement contains the following falsehoods:

- that I willfully disobeyed the preliminary injunction on numerous occasions. The truth is that I did not, and, despite Scientology's efforts and pressure to have me found in contempt and jailed for its own manufactured charges, Judge Wayne discharged me and the OSC.

- that Judge Wayne heard the OSC in December 1994. The truth is that Judge Wayne issued an order discharging the OSC on July 29, 1994.

- that I admitted the violations. The truth is I did not. There were no violations. And I strenuously opposed Scientology's efforts to have me found in contempt and punished for its manufactured charges.

- that I pled for mercy from the court. The truth is I did not. I rejected Scientology's efforts to have me punished on its trumped up charges.

- that Judge Wayne discharged the contempt but admonished me to conduct myself appropriately in the future. The truth is she made no such comment in her ruling.

Appended hereto as Exhibit 30 is a true and correct copy of Judge Wayne's Order of July 29, 1994 discharging the OSC. (Also AOB CT 7499-7501) (See also 12/22/92 letter, Ex.26 hereto, pp25-36)

86. In his OSC application declaration Mr. Wilson states:

"On or about October 14, 1997, in violation of the Order, Armstrong created and cause to be disseminated by means of the Internet a documentary work which discussed CSI and other beneficiaries of the Settlement Agreement. A true and correct copy of said documentary

work is attached hereto as Exhibit F." (Wilson OSC Dec, Ex. 29, 17:9-12; Ex. 29, pp39,40)

This is false. My post did not discuss CSI. Also, Scientology has produced here an altered version of my post, deleting the name "Xenu" from the final line on p.1 of the post (Ex. 29, p39), which should read "'ARC," or Xenu, etc., etc." Scientologists are taught in the organization's "secret" "upper levels," and must believe if they would be Scientologists, that 75 million years ago an evil tyrant named Xenu brought people from all over the galaxy to earth, dumped them in volcanoes and exploded the volcanoes with hydrogen bombs. The murdered beings were then assembled and electronically implanted to make them into the degraded beings Scientologists think humans are today. Scientology teaches that human bodies are masses of these degraded entities called "body thetans." Scientology teaches that God and Christ are not real, but are electronically implanted ideas from the Xenu period implanters, used to enslave people. I believe that Scientology's teachings on this subject are madness, are a factor in the organization's propensity for abusing its members and attacking its critics, and should be exposed to reduce or eliminate the abuse and attacks.

87. In his OSC application declaration Mr. Wilson states: "The "letter" [to the Commission on Security and Cooperation in Europe] (Ex.21 hereto, and Ex.29, pp47-55) continues with Mr. Armstrong's litany of false and derogatory charges against CSI and its affiliates with which this Court is all too familiar and with which this Court would not have been burdened if Mr. Armstrong had simply obeyed the Order." (Wilson OSC

Dec, 18:9-11)

This is false. There are no false and derogatory charges against Scientology in my letter to the CSCE. All my statements are true.

These charges are before the Marin Superior Court, this Court of Appeal, the CSCE, and the world, not because I have disobeyed the Marin Court's Order, but because Scientology is engaged in activities against me and others which are violative of human rights and are dangerous. Scientology is engaged in high level political machinations involving, and representing a threat to, US relations with foreign nations and Constitutional rights of citizens within the US. These issues brought me to write to the CSCE and to make public my knowledge about the political and antisocial goals of Scientology. I believe that no court in the US can legally strip me of my right to participate in public controversies and political and Constitutional issues of this level and nature which impact me directly and in which I have potentially vital information which the public has a right to know.

88. In his OSC application declaration Mr. Wilson states:

"Renate Rennenbach and Ursula Caberta...have been engaged for the past several years in attempts to discredit the Church through various means and have lobbied various German government entities to essentially legalize discrimination against members of the Church of Scientology because of their Church membership. In fact, Germany has been censored for the past three years by the United Nations and the Helsinki Commission for just such discrimination. The United States Department of State has also found a pattern of

human rights abuses by Germany against Church members."

(Wilson OSC Dec, Ex. 29, 19:3-9)

This is false. On information and belief, Ms. Rennebach and Ms. Caberta's opposition to Scientology is due to the organization's human rights abuses. In Germany, Scientology is not recognized as a "religion," but is recognized as a commercial enterprise with a totalitarian nature and global political goals. On information and belief, the United Nations did not censor Germany at all in the past three years, and certainly not in relation to Scientology. It is Scientology, through attack, threat, illegal "contracts," and illegal enforcement thereof, which attempts to censor its own members, and censor anyone who would criticize or attempt to reform its antisocial practices. On information and belief, the US State Department's support of Scientology's attack on Germany, and on other countries which have acted to restrain the organization's abusive practices, is misguided, and erroneously based on Scientology's fair game attacks and false statements, including its false statements about me. Germany and other countries oppose Scientology because of what the organization is doing to me: its use of the US Courts to strip me of my basic rights to freedom of conscience, freedom of speech, freedom of religion, freedom of association, freedom from slavery and due process. There are many people in many countries who are aware of Scientology's legal attacks on me, and who are observing the US Courts' actions and rulings in these proceedings. On information and belief, there are thousands of Scientologists and ex-Scientologists in the US who have been shuddered into silence by Scientology and whose basic freedoms will be regained once Scientology's efforts to judicially silence me are stopped.

89. In his OSC application declaration Mr. Wilson states:
"A review of this virtually unintelligible "complaint"
(Armstrong v. Miscavige, US District Court, District of
Nevada, Case No. CV-N-00670-ECR, Ex. 14 hereto, also
Ex.29, pp81-96) reveals its true nature, a cynical
attempt to cloak Armstrong's anti-Scientology ravings
with the litigation privilege." (Wilson OSC Dec, Ex.
29, 19:23-26)

This statement contains the following falsehoods:

- that this complaint is virtually unintelligible. The truth is that it is not virtually unintelligible and that Mr. Wilson knows it is not virtually unintelligible. He wrote to my attorney George Abbott on December 12, 1997 (Ex.27 hereto) indicating his having read and understood the complaint, although apparently pretending to not understand the principles of res judicata and collateral estoppel. (Ex.27 and Ex.28 hereto, and ¶¶77-79, supra) Additionally, a number of other people have read the complaint, and some have posted responses to the internet, all indicating that the complaint is not virtually unintelligible. A reading of the complaint by any reasonably intelligence person will confirm that it is not virtually unintelligible.

- that the complaint's true nature is a cynical attempt to cloak my anti-Scientology ravings with the litigation privilege. The truth is that the complaint contains no anti-Scientology ravings, nor do I have any anti-Scientology ravings. I have made logical, literary, intelligent statements about the abuses and dangers of this organization. The truth is that there is nothing cynical in my US District Court complaint. The complaint is an effort through the US Justice system to bring to light

Scientology's tortious black PR attacks on me and to get it to cease these attacks. The truth is that Scientology, by its abuse of the justice system and its use of the law to harass, is seeking to deny me, impermissibly, the litigant's privilege, as well as Constitutional guarantees of freedom of speech, freedom of religion, freedom of association, freedom to petition, due process, and freedom from slavery.

90. In his OSC application declaration Mr. Wilson states:

"The recent violations of the Injunction in Great Britain and Germany have forced the Church to expend a great deal of time and money to correct the multiplicity of falsehoods and lies which Armstrong has promulgated." (Wilson OSC Dec, Ex. 29, 19:27-7:1)

This is false. I promulgated no falsehoods and lies. I merely attempted, as every person has a right when assailed by lies told about him, to bring those lies to the light of truth. Mr. Wilson identifies no lies that I told. I have herein identified many he has told. Mr. Wilson, being a Scientology lawyer, is a beneficiary of the illegally obtained "settlement agreement" and Marin Superior Court order (see, e.g., Wilson Dec, Ex.C, 7:9,10, "CSI legal counsel;" 8:14-16, prohibition against discussing "Beneficiaries") and thus has an interest in telling falsehoods and having them believed. Scientology has not been forced to expend a great deal of time and money to correct anything I have said. Scientology has spent its money on attacking me with more lies.

91. In his OSC application declaration Mr. Wilson states:

"Armstrong's claimed expertise concerning the Church, based on nothing more than having been the clerk

entrusted with care of certain of Mr. Hubbard's personal files, gives him a superficial credibility, even though he has not been involved in any facet of the Scientology religion since 1981." (Wilson OSC Dec, Ex. 29, 20:1-4)

This is false. It is also the standard Scientology black PR attack line about my Scientology experiences. (See, e.g., Armstrong v. Miscavige complaint, Ex. 14 hereto, p.8, n.1). The truth is that my positions in the Sea Organization, the top echelon of the global Scientology enterprise, included Ship's Legal Officer, Ship's Public Relations Officer, Ship's Intelligence Officer, L.Ron Hubbard's Deputy External Communications Aide, Deputy Commanding Officer of Hubbard's Household Unit, and L. Ron Hubbard Biography Researcher. Additionally, since 1981 I have been intimately involved with the litigation, fair game and black PR facets of the Scientology enterprise, having been the target of these antisocial facets without letup from that year to the present. (See, e.g., Ex.7 and Ex.8 hereto, and all facts herein, and the complete record on appeal)

92. In his OSC application declaration Mr. Wilson states: "The Church did not pay Armstrong to silence him, but to save itself the time and expense of responding to and correcting every false allegation." (Wilson OSC Dec, Ex. 29, 20:5-7)

This is false. I made no false allegations, thus there were none to respond to and correct. Scientology paid me to dismiss my lawsuit against it for fraud for the years of waste and abuse inside the organization, and intentional infliction of emotional

distress for the years of fair game attacks, including physical assault and attempts to have me jailed on false charges, after leaving. Scientology apparently wished to silence me so that it could attack me with impunity, and thus continue to defraud and abuse other victims; but it did not pay me to be able to do so.

93. Appended hereto as Exhibit 31 is a true and correct copy of a section downloaded this date from Scientology's webbed, advertised, and publicly available "'Freedom'" magazine at <http://www.freedom.org.uk/mag/issuea03/page00.htm>. Scientology states:

"That vacation [of documentary producer Jill Robinson] was found to consist of a series of interviews, including discussions with former Church members expelled for their misdeeds, and long ago exposed in a plot to extort money from the Church (see Secret Lies,). Among them: Gerry Armstrong, a fugitive from justice in the United States, seeking to avoid a jail cell after he was found in contempt of court for spreading lies about Mr. Hubbard and the Church. He owes the Church hundreds of thousands of dollars for grievous violations of court orders. This is the same man who was captured on video boasting of his ability to falsify "I can create documents with relative ease. I used to do it for a living. ... Just f...ing allege it. What's more, rather than contacting the Church or seeing Church facilities while in Los Angeles, she travelled to Canada, where this source was hiding out from U.S. law enforcement." (Ex. 31)

94. This statement contains the following falsehoods about

me:

- that I was expelled for my misdeeds. The truth is that I escaped from Scientology.

- that I was exposed in a plot to extort money from Scientology. The truth is that I was never involved in a plot to extort money from Scientology, and I know of no such plot.

- that I am a fugitive from justice in the United States. The truth is that I left the United States earlier this year in order to defend myself from exactly this kind of Scientology black PR and defend myself from its threats of harassment, including the threat of physical violence.

- That I sought to avoid a jail cell after I was found in contempt of court for spreading lies about Mr. Hubbard and Scientology. The truth is that I left the US in February, 1997 and the contempt order was issued, without a hearing, in June. I was not found in contempt for spreading lies about anyone or anything. Judge Thomas, erroneously, held me in contempt for reporting to US District Court Judge Ronald Whyte by declaration Scientology's threat of prosecution if I responded to Grady Ward's document production subpoena. I am not barred from spreading lies about Hubbard and Scientology, and I have never spread lies about them.

- that I owe Scientology hundreds of thousands of dollars for grievous violations of court orders. The truth is that I owe Scientology nothing, and that I have never committed grievous violations of court orders. I owe Scientologists, as well as non-Scientologists, the truth about this organization's nature, policies and practices, as they are pernicious and dangerous.

- that I was captured on video boasting of my ability to

falsify. The truth is that the videotape Scientology made of me was illegally obtained, and does not contain such a "boast" by me. The nearest thing to this statement on the illegal video is my referring to my history inside Scientology where I was routinely required to falsify documents.

- that I was hiding out in Canada from U.S. law enforcement. The truth is that I was in Canada where I needed to be safe from Scientology's threats, including the threat of physical violence or assassination, and to be in a position to correct the black PR Scientology was continuing to spread about me, especially the black PR contained in its application for tax exemption submitted to the IRS. The Scientology organization itself was convicted in Canada of criminal breach of public trust, is widely known in that country as a criminal cult, and cannot, I believe, as easily as it does in the US, use the law to harass its targets.

95. It is noteworthy that although I participated in two radio shows in Canada about Scientology, and discussed my experiences with, and knowledge of, the organization, Scientology has not sought in its OSC application to have me held in contempt for those radio show appearances. Scientology knows of my appearances because its own personnel either participated as well in the radio shows or sent black PR documents to the radio stations about me at the time of the shows. On information and belief, Scientology is not attempting to have me punished for these radio show appearances because Scientology is known as a criminal cult in Canada, and such an attempt would be seen in Canada for what it actually is: suppression of legally unsuppressible civil rights.

96. Appended hereto as Exhibit 32 is a true and correct

copy of a post to ARS December 19, 1997 by Scientology agent RonsAmigo, which states:

"I believe that the only correct response to the ARS bigot brigade is all out attack. I believe that by any and all legal means the battle should be brought to the front door of those *individuals* who take joy in harrassing me, my friends and my Church. I don't give a damn if they think or honestly believe that they are engaged in some noble endeavor of just cause. If resources aren't available for this purpose, they should be made available. Scientologists as a rule are passionate about defending their Church from this kind of rabble. I don't see any reason why there should be any scarcity of resources on these lines.

It is not time for a "truce." It is time to take the gloves off and rather than just engage in a few token moves like picketing a few of the bigot's homes, it is time for an all out attack on those who as an avocation or vocation seek to destroy my religion." (Ex. 32, p2)

RonsAmigo uses the term "bigots," which is Scientology's black PR designation for critics and reformers of the organization's antisocial and criminal nature and activities.

97. Mr. Wilson states in his declaration in support of Scientology's motion to dismiss this appeal:

"Armstrong was also the principal witness for the other plaintiffs, as a self-proclaimed expert on the workings and management of [Scientology]." (Wilson Dec, p1, ¶2)

Judge Breckenridge took judicial notice of my knowledge and testimonial expertise in Scientology during the LA SC trial in

1984. He also commented in his decision, affirmed on appeal, on my "extensive knowledge of [Scientology's] covert and intelligence operations." (Ex. 25, Appendix 14:6-8) I have been designated as an expert witness in a number of Scientology litigations concerning my knowledge of organization fraud and fair game, and I have been paid for my service in providing that knowledge by way of testimony. I have testified in Scientology litigations in trial or deposition approximately 60 days, and written and executed approximately the same number of expert declarations or affidavits.

98. Mr. Wilson states in his declaration:

"In settling this litigation, it was the Church's desire to end its relationship with Armstrong once and for all." (Wilson Dec. p1, ¶2)

This is untrue, and belied by the facts at the time of the settlement, (See Ex. 6 hereto) the facts over the past 11 years, and the facts now. Scientology wants its relationship with me not to be ended, but to be one in which its leaders, followers, agents, lawyers and PIs may say whatever they want about me and I cannot respond, and to be a relationship in which I am jailed, hurt, humiliated and ruined utterly. They have done things which stretched the law and human decency standards, and they have gone beyond the law and standards to do other things, all to continue our relationship as described above, an abusive relationship which Scientology says it bought.

99. Mr. Wilson states:

"I questioned [Armstrong] as to whether he intended to obey the [May, 1992] order of Judge Sohigian. Armstrong responded:

"I have absolutely no intention of honoring that agreement..."

A true and correct copy of the relevant pages of that deposition are attached hereto and incorporated herein as Exhibit A." (Wilson Dec, p3, ¶4)

Mr. Wilson is being untruthful. During that deposition, he did not ask me about the Sohigian order, but about the "settlement agreement," and it was to his question about the "settlement agreement" that I responded. An examination of the single deposition page 124 which Mr. Wilson has designated his Exhibit A will reveal that there is no mention of Judge Sohigian nor his order.

100. Mr. Wilson states that in Judge Thomas's Permanent Injunction Order there are:

"enumerated 31 breaches of the settlement agreement by Armstrong ... all of which were carried out in violation of Judge Sohigian's preliminary injunction..." (Wilson Dec, p4, ¶8)

This is completely false. Not one of the 31 "breaches" was a violation of Judge Sohigian's order. Many of the "breaches" Scientology has listed predate Judge Sohigian's order, and the remainder, "breaches" such as discussing my Scientology experiences with people, or communicating to the media about Scientology are not violations of the order. (See Ex. C to Wilson Dec)

101. Mr. Wilson states:

"On October 7, 1996 Armstrong sent a letter to the Los Angeles City Council, which at the time was considering the renaming of a city street in honor of L. Ron

Hubbard...Armstrong's letter...was a direct and
flagrant breach of both the settlement agreement and
1995 Order of Permanent Injunction." (Wilson Dec, p5,
¶10)

This is false. Although the language of the "settlement
agreement" prohibited me from communicating to government
agencies, I was successful at least in the litigation in the
Superior Court in having that prohibition changed in the
permanent injunction. That order specifically permits me to
"[v]oluntarily assist[] any [] governmental organ or entity []
regarding [Scientology, its claims and claims against it]."
(Wilson Dec, Ex. C, 7:4-7; 8:1-7). It was clear to me that the
Los Angeles City Council is a governmental organ. It is therefore
clear that my letter to that governmental organ is permitted by
the "permanent injunction." Mr. Wilson's letter of October 23,
1996 (Wilson Dec, Ex. E) threatening that the permitted action of
sending my letter to the LA City Council was a violation of the
injunction which Scientology intended to call to the Marin
Superior Court's attention, was a factor in my decision in
January, 1997 to leave the US.

102. Scientology states in its motion:

"In December 1986 the Church sought to end a period of
long and bitter litigation with Armstrong...

[Scientology] paid \$800,000 and entered into the
Settlement Agreement..." (Scn Memo, pp1,2)

This is false. Scientology did not pay me \$800,000. It paid a
lump sum to Michael Flynn to settle some twenty cases against
Scientology, including my lawsuit against the organization.
Scientology did not know how much I was being paid to dismiss my

complaint, and the amount I was paid, since Scientology did not know that I was being paid one thin dime, is irrelevant in the organization's efforts to enforce the "settlement agreement." The amount is, however, relevant as an indicator of value of the abuse and fair game claims which I dismissed in the "settlement."

Scientology also did not seek to end its litigation with me, but sought a relationship where the organization and all its agents could attack me and I would be unable to respond. Scientology's desire for such an abusive relationship has resulted, not in an end to its litigations with me, but in their proliferation.

103. Scientology states that the "settlement agreement" required me "to return to the Church the documents which [I] had stolen..." (Scn Memo, p2) This is false. I did not steal the subject documents, and Judge Breckenridge in his decision following my trial in 1984 found that I did not steal the documents. (Ex. 25 hereto, also Scientology v. Armstrong, (1991), 232 Cal.App.3rd 1060, 283 Cal.Rptr. 917)

104. Scientology states:

"Unfortunately, the peace which the Church bargained for was short-lived. In 1990, Armstrong conveyed virtually all of his assets to his lawyer and close friends and then began repeatedly breaching the Settlement Agreement." (Scn Memo, p2)

This is false. Scientology never bargained for peace. They have continued from the date of the "settlement agreement" to make war on me. My conveying my assets was unrelated to Scientology, and unrelated to my "breaches" of the settlement agreement. (See, e.g., AOB p17) I have spoken out about Scientology's attacks and abuses because it is dangerous, obstructive of justice and unwise

not to do so.

105. Scientology states:

"The Court of Appeal, Second Appellate District, affirmed Judge Sohigian, recognizing that it was quite proper to restrain"...Armstrong's voluntary intermeddling in other litigation..." (Scn Memo, p3)

This is false. The Court of Appeal actually stated:

"This appeal is only from the granting of a preliminary injunction which expressly did not decide the ultimate merits. As limited by the trial court here, the preliminary injunction merely restrains, for the time being, Armstrong's voluntary intermeddling....We decline any extended discussion of Armstrong's shotgun-style brief, which offers more than a dozen separate contentions against enforcement." (Wilson Dec, Ex.B, p10)

106. Scientology states:

"Armstrong's defiance continues before this Court. In his Opening Brief, he boldly reaffirms his refusal to abide by the court's lawful orders and declares..."he cannot be silenced by the obstructive [Settlement Agreement], nor by the Marin Court's enforcement." Appellant's Opening Brief at 41" (Scn Memo p6)

This is false. The Marin Superior Court's order is not lawful.

What I actually state in the AOB is:

" The reporting of obstruction of justice cannot be obstructed. The reporting of perceived obstruction of justice, or any other crime, cannot be prohibited until such time as the obstruction or other crime is proven.

[I have] been unshakable in [my] conviction that the S[ettlement] A[greement] and Sc[ientology]'s enforcement are obstructive of justice since [I] first petitioned the Court of Appeal for permission to respond in the Armstrong I appeal in 1990. (CT 6119-21) [I] continue[] to make the argument the moment these words are typed. [My] argument is not without merit. For that reason alone [I] cannot be silenced by the obstructive SA, nor by the Marin Court's enforcement, and it is enough reason for this Court to rule that there is a triable issue regarding that obstruction."

(AOB, p41)

I am again, here within the instant document, making this same argument, and again demonstrating that I cannot be silenced by the "settlement agreement;" but not because I am, as Scientology would paint me, in defiance of Law and Justice, but because Scientology's actions, including its bringing of this motion to dismiss the appeal, make my silence impossible.

107. Scientology states:

"Armstrong defied the preliminary injunction though it was upheld on appeal..." (Scn Memo, p9)

This is false. Although Scientology attempted to have me held in contempt of court for some ten charged violations of the preliminary injunction, all of these were found by Judge Wayne in July, 1994, to not be violations and were all discharged. The "breaches" listed by Scientology in its permanent injunction were also not violations of the preliminary injunction.

108. Scientology states:

"[Armstrong] then repeatedly violated the permanent

injunction and was held in contempt for doing so." (Scn Memo, p9)

This is false. Judge Thomas stated in granting Scientology's contempt order that I violated the permanent injunction once, by sending a declaration to United States District Judge Ronald M. Whyte. (Ex 1 hereto) As shown in ¶¶ 3-12, supra, my sending a declaration to Judge Whyte, because of attorney Wilson's threat after I was subpoenaed, was not a violation of the injunction.

109. Scientology states:

"Rather than discharge the contempt, he fled the jurisdiction." (Scn Memo. p9)

This is false. I was in Canada in February. Scientology obtained its contempt order in June.

110. Scientology states:

"He now prosecutes this appeal, apparently from Canada and, while still in contempt, travels to Germany to commit further violations of the permanent injunction from which he now appeals." (Scn Memo p9)

This is false. I have had a new residence in Nevada for some time, and am in the process of moving my belongings from Canada. It is only my very limited resources which have made this a slower than hoped for process. During the remainder of my prosecution of this appeal, I expect to be in Nevada. I traveled to Germany, because of Scientology's abusive and criminal activities, including its attacks on the German people, because Scientology threatens democratic institutions and principles, and because of the urgent need to help the victims of Scientology's attacks.

111. I will also now be filing an opposition to

Scientology's application for an OSC re Contempt in Marin Superior Court, and attending the hearing on this matter, now set for January 30, 1998. Appended hereto as Exhibit 33 is a true and correct copy of a letter I faxed December 16, 1997 from the office of George W. Abbott in Nevada to Scientology attorney Andrew Wilson, advising him that I was there and available for accepting service of Scientology's OSC documents. I received these documents on December 17, and so advised Mr. Wilson's office. I am not hiding out, but have been forced by Scientology's attacks and threats, to be very visible and to participate in the public discussion of, and opposition to, this organization.

112. Scientology states:

"As the appeal is readily resolved without reference to the merits of the action and simply by review of these few enumerated documents (exhibits to Wilson Dec), thereby obviating the need of Respondent and this Court to review and digest the extensive record, it should be granted in the interests of judicial economy." (Scn Memo, pp9,10)

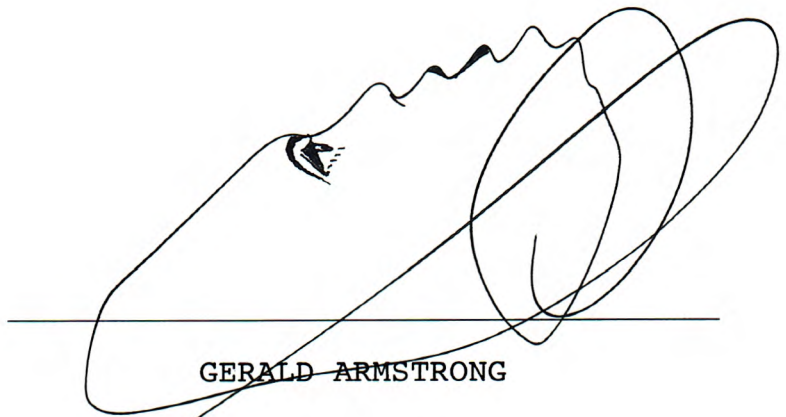
This is false. Such an unjust "resolution" of this appeal will only result in more injustice and an even greater proliferation of litigation. Judicial economy will be served when Scientology is barred from using the Law to harass its critics, reformers and designated fair game targets, and barred from using the Justice System to strip people of their Constitutional rights.

113. Scientology's actions, its threats, black PR and legal attacks, have made my relationship with the organization, especially its leaders, OSA agents and attorneys, a full-time

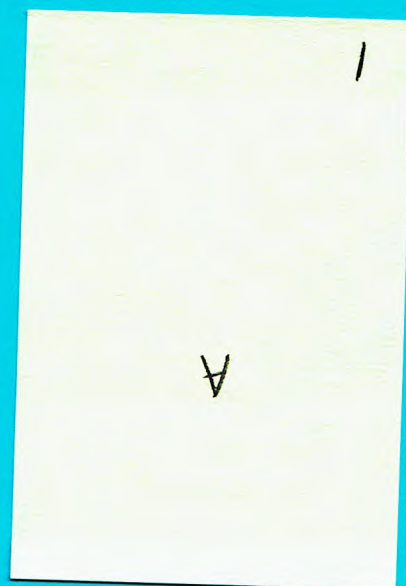
affair, which cannot by judicial order be terminated. Scientology got me removed from my four-year paralegal job with attorney Ford Greene, and threats from the organization directly prevented me from obtaining two other good jobs. Threats from the organization caused me to leave California, and ultimately relocate to Nevada. Responding to Scientology's legal actions, with my limited resources and minimal legal knowledge and expertise, is difficult and draining. Because of the position in which Scientology has placed me through its attacks, and its use of its black PR on me in so many contexts, including as a basis for its IRS tax exemption, the threat of violence is real, and it is oppressive. Scientology's leaders possess arms and hire corrupt and dangerous bullies to attack their enemies. Scientology's continuing black PR is dispiriting and stressful. I have kept going over the years because of God's strength and the support He sends in friends and family.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at Chilliwack, B.C., Canada on December 27, 1997.



GERALD ARMSTRONG



FILED

JUN 05 1997

1 Andrew H. Wilson
2 WILSON, RYAN & CAMPILONGO
3 235 Montgomery Street
4 Suite 450
5 San Francisco, California 94104
6 (415) 391-3900

7 Attorneys for Plaintiff
8 CHURCH OF SCIENTOLOGY INTERNATIONAL

JOHN P. MONTGOMERY,
Court Executive Officer
MARIN COUNTY COURTS
By: C. Baker, Deputy

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF MARIN

11 CHURCH OF SCIENTOLOGY)	Case No. 152229
12 INTERNATIONAL, a California)	
13 not-for-profit religious)	
14 corporation;)	<u>ORDER OF CONTEMPT</u>
15 Plaintiff,)	
16 vs.)	
17 GERALD ARMSTRONG; DOES 1)	
18 through 25, inclusive,)	
19 Defendants.)	

20 The contempt proceedings against Defendant GERALD ARMSTRONG
21 came on for hearing by the Court on May 23, 1997 pursuant to this
22 Court's ORDER TO SHOW CAUSE RE CONTEMPT issued on February 18,
23 1997, and further pursuant to this Court's ORDER ALLOWING SERVICE
24 OF THE ORDER TO SHOW CAUSE RE CONTEMPT issued on March 5, 1997.
25 Petitioner CHURCH OF SCIENTOLOGY INTERNATIONAL appeared by its
26 counsel, Andrew H. Wilson. Defendant ARMSTRONG did not appear
27 nor did Defendant file any opposition or evidence.

28 GOOD CAUSE APPEARING THEREFOR, the Court makes the following
findings:

1. On October 17, 1995 this Court entered an Order of Permanent Injunction against ARMSTRONG (the "Order") following motions for summary adjudication brought by Plaintiff. This

1 Order was later incorporated into a judgment entered against Mr.
2 Armstrong on May 2, 1996 (the "Judgment"). The Order prohibits
3 ARMSTRONG from voluntarily assisting any persons litigating
4 claims adverse to the "Beneficiaries" and from creating or
5 publishing "works" discussing any of the Beneficiaries. One of
6 the Beneficiaries is a corporation known as Religious Technology
7 Center ("RTC").

8 2. The Order was valid when rendered and remains fully
9 enforceable, notwithstanding ARMSTRONG's appeal of the Judgment.
10 The filing of a Notice of Appeal does not render a valid order
11 unenforceable.

12 3. ARMSTRONG had knowledge of the Order. ARMSTRONG's
13 counsel appeared at the hearing pertaining to the Order and
14 received Notice of Entry. ARMSTRONG also received a Notice of
15 Entry of Order which was served on his counsel. ARMSTRONG's
16 actual knowledge of the Order is also shown by the fact that
17 ARMSTRONG himself signed and filed a Notice of Appeal of the
18 Judgment.

19 4. ARMSTRONG had the ability to comply with the Order. The
20 Order was specific. It prohibited ARMSTRONG from voluntarily
21 assisting any person arbitrating or litigating adversely to the
22 Beneficiaries and also prohibited ARMSTRONG from facilitating in
23 any manner the creation, publication, broadcast, writing,
24 electronic recording or reproduction of various documentary
25 works. There has been no suggestion, and certainly no showing by
26 ARMSTRONG, that he is incapable of complying with the Order.

27 ///

28 ORDER OF CONTEMPT

5. ARMSTRONG willfully disobeyed the Order. On or about January 26, 1997, ARMSTRONG sent a document entitled DECLARATION OF GERALD ARMSTRONG to United States District Judge Ronald M. Whyte. Judge Whyte was at the time presiding over three cases in which the plaintiff is RTC. In the Declaration, ARMSTRONG recites his understanding that he was prohibited from sending such a Declaration directly to litigants and states that he is instead sending it directly to Judge Whyte in the hopes of influencing his decision on a pending matter. This evidences ARMSTRONG's willful disobedience of the Order and Judgment.

IT IS HEREBY ADJUDGED, ORDERED AND DECREED that Defendant GERALD ARMSTRONG is guilty of Contempt of Court for a failure to obey the Order and Judgment by sending the Declaration, as described above, to Judge White. As set forth above, the Order was valid and enforceable; ARMSTRONG had knowledge of the Order, had the ability to comply with the Order and willfully disobeyed the Order.

IT IS FURTHER ADJUDGED, ORDERED AND DECREED that Defendant GERALD ARMSTRONG is to be punished for the foregoing contempt by a fine of \$1,000.00 and confinement in the County Jail for a period not to exceed 48 hours.

Dated: JUN 03 1997

GARY W. THOMAS

JUDGE OF THE SUPERIOR COURT

Jocs\pic\sci02.003\contempt.ord

PROOF OF SERVICE

I declare that I am employed in the City and County of San Francisco, California.

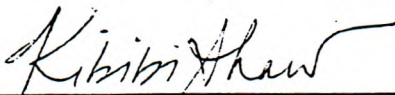
I am over the age of eighteen years and not a party to the within entitled action. My business address is 115 Sansome Street, Suite 400, San Francisco, California.

On June 9, 1997, I caused the attached copy of **RESPONDENT'S OPPOSITION TO APPELLANT'S REQUEST FOR EXTENSION OF TIME TO FILE OPENING BRIEF AND DECLARATION OF ANDREW H. WILSON IN OPPOSITION TO APPELLANT'S REQUEST FOR EXTENSION OF TIME TO FILE OPENING** on the following in said cause, by placing for deposit with S-CAR-GO Couriers, Inc. on this day in the ordinary course of business, true copies thereof enclosed in sealed envelopes. The envelopes were addressed as follows:

Gerald Armstrong
c/o George W. Abbot, Esq.
2245-B Meridian Boulevard
P.O. Box 98
Minden, Nevada 89423-0098

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at San Francisco, California on June 9, 1997.


KIBIBI N. SHAW

2

B

January 26, 1997

Honorable Ronald M. Whyte
United States District Court
280 South First Street, Room 2112
San Jose, CA 95113

BY MAIL

Re: RTC v. Ward
RTC v. Henson
RTC v. Erlich

Dear Judge Whyte:

The first few pages of this declaration explain why I am sending it directly to you.

I hope that you take the time to understand why I have done so and what the declaration and exhibits mean.

Thank you for your anticipated appropriate decisions.

Yours sincerely,

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450

cc (letter, dec and exs):
Grady Ward
Keith Henson
Harold J. McElhinny, Esq.
Thomas R. Hogan, Esq.



UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

Religious Technology Center,
Plaintiff,
v.
Grady Ward,
Defendant

No. C-96-20207 RMW

Religious Technology Center,
Plaintiff,
v.
H. Keith Henson,
Defendant

No. C-96-20271 RMW

Religious Technology Center,
et al.,
Plaintiffs,
v.
Dennis Erlich, et al.,
Defendants

No. C-95-20091 RMW

DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare:

1. I have personal knowledge of the facts set forth in

1 this declaration and could competently testify thereto if called
2 as a witness.

3 2. I am a writer, artist and philosopher. Theologically
4 speaking I am a prophet. Speaking religiously, I am a Christian.

5 3. I am an expert and have testified as an expert in the
6 areas of the Scientology organization's structure, nature,
7 philosophy, policies, practices, history, specifically regarding
8 its notorious fair game doctrine, its fraudulent representations,
9 its legal abuses and tactics, and its "theology." I have
10 testified, either in deposition or trial, over 60 days in
11 approximately 20 Scientology related cases. I have written and
12 executed dozens of declarations, which I will supply the Court if
13 requested, concerning my Scientology knowledge and experiences.
14 I have stated most of the facts contained in this declaration in
15 these earlier sworn statements.

16 4. I have been sued by the Scientology organization five
17 times since 1982 in its continuing effort to prevent me from
18 speaking the truth and to destroy me financially. I have been
19 throughout this time a world-wide target of Scientology's
20 character assassination campaign or "black propaganda," which it
21 also calls "dead agenting." To "dead agent" someone, according
22 to Scientology founder L. Ron Hubbard, is to destroy a target's
23 credibility so that someone else "kills" him. I will list some
24 of these acts below. Scientology is controlled and directed by
25 David Miscavige.

26 5. Within the past three weeks I have obtained an internet
27 account and have started reading the newsgroup alt.religion.
28 scientology. Grady Ward, defendant herein, posted a request for
declarations concerning knowledge of fair game operations, and

specifically ops involving organization private investigator Eugene M. Ingram. Mr. Ward stated that the declarations are needed fairly urgently. I have such knowledge, some of which I will provide below. I am aware of the related cases before this Court, RTC v. Erlich, and RTC v. Henson, and will also provide this declaration to those parties.

6. I am submitting this declaration directly to the Court because of an order filed October 17, 1995, a true and correct copy of which is attached herewith as Exhibit A, in the case of Scientology v. Gerald Armstrong, Marin Superior Court Case No. 157680 ("Armstrong IV"). By that order, which became part of a "judgment" filed May 2, 1996, a true and correct copy of which is attached herewith as Exhibit B, I am prohibited from:

"2. Voluntarily assisting any person (not a government organ or entity) defending a claim, intending to defend a claim, intending to defend an arbitration, or intending to defend any claim being pressed, made, arbitrated or litigated by any of the Beneficiaries, regarding such claim or regarding defending, arbitrating, or litigating against it;

3. Voluntarily assisting any person (not a government organ or entity) arbitrating, or litigating adversely to any of the Beneficiaries;" (Ex. A, 8:1-7)

7. The "Beneficiaries" are:

- The Church of Scientology International, its officers, directors, agents, representatives, employees, volunteers, successors, assigns and legal counsel;

- The Church of Scientology of California, its officers, directors, agents, representatives, employees, volunteers,

1 successors, assigns and legal counsel;

2 - Religious Technology Center, its officers, directors,
3 agents, representatives, employees, volunteers, successors,
4 assigns and legal counsel;

5 - The Church of Spiritual Technology, its officers,
6 directors, agents, representatives, employees, volunteers,
7 successors, assigns and legal counsel;

8 - All Scientology and Scientology affiliated Churches,
9 organizations and entities, and their officers, directors,
10 agents, representatives, employees, volunteers, successors,
11 assigns and legal counsel;

12 - Author Services, Inc., its officers, directors, agents,
13 representatives, employees, volunteers, successors, assigns
14 and legal counsel;

15 - The Estate of L. Ron Hubbard, its executor,
16 beneficiaries, heirs, representatives, and legal counsel;
17 and/or

18 - Mary Sue Hubbard;" (Ex. A, 7:8-28).

19 8. By this order I am prohibited from providing this
20 declaration to Mr. Ward, Mr. Erlich or Mr. Henson for their
21 defense, since the plaintiff RTC is one of the "beneficiaries."
22 Eugene Ingram, being Scientology's agent, is a protected
23 "beneficiary" as well, as are all of its corporations' attorneys,
24 including its attorneys herein.

25 9. I am also prohibited by this order from:

26 "5. Discussing with anyone, not a member of [my]
27 immediate family or [my] attorney, Scientology, the Church,
28 and/or any of the Beneficiaries;" (Ex. A, 8:14-16)

Thus, I may not even, and remain in compliance with this order,

1 tell Mr. Ward, Mr. Erlich, Mr. Henson, or anyone else being
2 persecuted by the Scientology organization with its well known
3 and well greased fair game machinery and operatives, one word of
4 my knowledge concerning these persecutors, or that I am myself so
5 persecuted.

6 10. This order does not, however, prohibit me from
7 voluntarily assisting a person judging litigations involving the
8 order's "beneficiaries." I believe that the United States
9 District Court is a "governmental organ or entity" excluded from
10 the prohibitions of the order. (See, Ex. A, 8:1,2; 6,7) I am
11 therefor providing the original of this declaration to the Court.
12 I also believe that it would be improper to send this declaration
13 to the Court in secret, thus I am sending copies to the parties
14 or their counsel.

15 11. I believe the order and judgment are illegal on their
16 faces, and obtained by Scientology through illegal tactics. The
17 "contract" which the "order" enforces was obtained by Scientology
18 through threat, fraud, related criminal activities, and the
19 vitiation of my lawyers. I have appealed the judgment, and
20 believe that I will prevail and be free from Scientology's very
21 damaging, illegal and evil efforts to keep me suppressed and
22 defenseless. In the meantime, I am by this declaration making
23 known some of Scientology's abuses, one of which is this order
24 itself, and I am working for their cessation, for safety, peace
25 and sanity on whatever channels remain to me. I know that
26 certain of Scientology's leaders and agents are vindictive,
27 desperate and dangerous, and have targeted me as a major "enemy."
28 I believe I am in considerable physical danger at this time.
What Scientology's leaders have done and ordered done to suppress

1 and destroy me in the past 15 years is unbelievable, and these
2 people evidence a continuing determination to keep that history
3 of suppression and destruction from ever being believed or even
4 known.

5 12. Attached hereto as Exhibit C is a true and correct copy
6 of a document entitled "Mutual Release of All Claims and
7 Settlement Agreement," (hereinafter, "settlement agreement")
8 which was part of the December, 1986 "settlement" of my cross-
9 complaint in the first case in which Scientology sued me in 1982,
10 Scientology v. Armstrong, Los Angeles Superior Court Case No.
11 420153 ("Armstrong I"). Scientology's judicial enforcement of
12 the "settlement agreement" resulted in the order and judgment
13 appended hereto as Exhibits A and B. I will describe in paras.
14 22 through 32 below how Scientology obtained my signature on this
15 document.

16 13. I became involved with Scientology as a customer in 1969
17 in Vancouver, B.C. I worked on staff there in 1970, and in
18 February 1971 joined the Sea Organization ("Sea Org" or "SO") in
19 Los Angeles. I was flown to Spain and joined the Sea Org's flag
20 ship, "Apollo," in Morocco. L. Ron Hubbard, the SO's
21 "Commodore," and all of Scientology's supreme leader, was on
22 board and operated Scientology internationally through the "crew"
23 which numbered, during my stay on board of four and a half years,
24 around four hundred. All my staff positions on board involved
25 personal contact with L. Ron Hubbard, Mary Sue Hubbard,
26 administrative organization staff, and people in the ports and
27 countries the "Apollo" visited, and included "Ship's
28 Representative" (legal officer), "Port Captain" (public relations
officer), and "Intelligence Officer."

1 14. In the fall of 1975, after the ship operation moved
2 ashore in Florida, I was posted in the Guardian's Office (GO)
3 Intelligence Bureau connected to Hubbard's Personal Office. From
4 December 1975 through June 1976 I held the post of Deputy LRH
5 External Communications Aide, a relay terminal for Hubbard's
6 written and telex traffic to and from Scientology organizations.
7 From July 1976 to December 1977 I was assigned, on Hubbard's
8 order, to the Rehabilitation Project Force ("RPF"), the SO prison
9 system, in Clearwater, Florida. In 1978 I worked in Hubbard's
10 cinematography crew in La Quinta, California making movies under
11 his direction until the fall of that year when he again assigned
12 me to the RPF, this time for eight months, initially in La
13 Quinta, then at a newly purchased base at Gilman Hotsprings near
14 Hemet, California. When I got out of the RPF in the spring of
15 1979, and until the beginning of 1980, I worked in Hubbard's
16 "Household Unit" ("HU") at Gilman, the SO unit which took care of
17 Hubbard's house, personal effects, transport, meals and so forth.
18 My posts included "Purchaser," "LRH Renovations In-Charge" and
19 "Deputy Commanding Officer HU."

20 15. Throughout 1980, and until I left the organization in
21 December 1981, I held the organization posts in Hubbard's
22 "Personal Public Relations Bureau" of "LRH Archivist" and "LRH
23 Personal Researcher." I assembled in Los Angeles an archive of
24 Hubbard's writings and other materials relating to his history to
25 be used as the basis for a biography to be written about the man.
26 I also worked in Los Angeles for the first few months of 1980 on
27 Mission Corporate Category Sortout ("MCCS"), which had the
28 purpose of restructuring the Scientology enterprise so that
Hubbard could continue to control it without being liable for its

1 actions. Beginning in the fall of 1980 and continuing until my
2 departure, I provided the biographical writings and other
3 materials, as I collected and organized them, to a non-
4 scientologist writer Omar Garrison, who had contracted with the
5 organization to write the Hubbard biography. I interviewed many
6 people who had known Mr. Hubbard at periods throughout his life,
7 including almost all of his living relatives. I traveled several
8 thousand miles collecting biographical information and conducting
9 a genealogy search, and arranged the purchase of a number of
10 collections of Hubbard-related documents and other materials from
11 individual collectors.

12 16. Through my research and study of documentary evidence I
13 learned that Mr. Hubbard had lied about his past, credentials,
14 accomplishments, relationships and intentions. I disproved many
15 of the claims made by Hubbard in his biographies printed in
16 Scientology publications and used in promotion of the man and his
17 philosophy and psychotherapy, and attempted to get the
18 organization executives responsible for these publications to
19 correct the false claims. As a result I was deemed a threat, and
20 ordered to be "security checked," an interrogation employing an
21 electronic meter as a lie detector, a procedure I had undergone
22 many times in the Sea Org. I had by this time also debunked the
23 significant representations Hubbard had made about himself or his
24 "technology" which had drawn me into and kept me in the
25 organization for over twelve years; e.g., that he was an engineer
26 and an atomic physicist; that he had been crippled and blinded in
27 combat in World War II and had cured himself with his mental
28 science discoveries; that it was a matter of medical record that
he had twice been pronounced dead; that his psychotherapy had

1 been subjected to rigorous scientific testing; that it cured all
2 psychosomatic ills and raised IQs a point per hour of therapy (I
3 had by this time had well over a thousand hours); that he had
4 been remunerated for his labors less than staff members were paid
5 (in my case between \$4.30 and \$17.20 per week throughout my 50
6 years); and that he and his organization were ethical and well-
7 intentioned. When it became clear to me that I was not going to
8 be able to get the organization or Hubbard to admit to the lies
9 and take a more honest path I left, along with my then wife
10 Jocelyn.

11 17. Following my departure the organization published a
12 "Declaration" dated February 18, 1982 labelling me a "Suppressive
13 Person ("SP")." An SP is considered in Scientology completely
14 psychotic and destructive, one of the two and a half percent
15 truly evil people on the planet. SPs are viewed as enemies of
16 Scientology and mankind and are targets for the organization's
17 "Fair Game Policy," which states specifically that they may be
18 lied to, cheated, sued and destroyed without discipline of the
19 Scientologist committing such acts. The "SP Declare" on me also
20 accused me of "spreading destructive rumors about senior
21 Scientologists." I knew in early 1982 that I was the target of
22 Guardian's Office intelligence operations because certain friends
23 were contacted and interrogated about me by known GO intelligence
24 personnel. In April, 1982 the organization also illegally
25 appropriated a set of photographs I had entrusted with an
26 associate, Virgil Wilhite, and when I demanded their return told
27 me to "get a lawyer."

28 18. A few days later I met with Boston, Massachusetts
attorney Michael Flynn, who agreed to defend me against the

1 organization, which on April 22, 1982 published a second SP
2 declare accusing me of eighteen "crimes, high crimes and
3 suppressive acts," including, inter alia, promulgating false
4 information about Hubbard and the organization. In the late
5 spring and summer of 1982 I obtained from Omar Garrison with his
6 permission some of the documents I had delivered to him while in
7 the organization which I considered I would need to defend myself
8 against the organization's charges in the SP declares and
9 whatever actions its leaders would bring against me in the non-
10 scientology courts. I sent these to Mr. Flynn, who was at that
11 time, and for the next four and a half years, the most effective,
12 prominent and attacked attorney combating Scientology, and to
13 Contos and Bunch, a California law firm, which by then had agreed
14 to be local counsel for me against the organization. Mr. Flynn
15 represented approximately twenty individuals with damage claims,
16 and was in communication with hundreds of people involved in
17 opposition to or knowledgeable about Scientology. The
18 organization filed the Armstrong I suit against me on August 2,
19 1982; and the Hubbard biography documents that I had sent to my
20 lawyers were ordered by the Court to be deposited with the Clerk
21 where they stayed until trial in the spring of 1984.

22 19. In August and September 1982 the organization employed a
23 number of private investigators to spy on and harass my wife and
24 me. During that period one of these investigators assaulted me
25 bodily, and another struck my body with a car, and attempted to
26 involve me in a freeway accident by getting in front of my car
27 and slamming on his brakes and pulling alongside my car and
28 swerving into my lane. The organization also attempted to get
the Los Angeles Police Department to bring criminal charges

1 against me in connection with the Hubbard documents which had
2 become the subject of the civil litigation in LA Superior Court.

3 20. I filed a cross-complaint for fraud and fair game in
4 1982 against various Scientology corporations which was severed
5 from the underlying document case and was never tried because it
6 "settled" in December 1986. The underlying document case was
7 tried without a jury by Judge Paul G. Breckenridge, Jr., who
8 rendered a decision on June 20, 1984, a true and correct copy of
9 which is attached hereto as Exhibit D. This document, known
10 around the world as the "Breckenridge decision," rebukes
11 Scientology's fair game doctrine and other abuses. It was
12 affirmed on appeal, Scientology v. Armstrong (1991), 232
13 Cal.App.3rd 1060, 283 Cal.Rptr. 917. Judge Breckenridge states:

14 "In addition to violating and abusing its own members
15 civil rights, the organization over the years with its
16 "Fair Game" doctrine has harassed and abused those
17 persons not in the [organization] whom it perceives as
18 enemies. The organization clearly is schizophrenic and
19 paranoid, and this bizarre combination seems to be a
20 reflection of its founder LRH. The evidence portrays a
21 man who has been virtually a pathological liar when it
22 comes to his history, background and achievements. The
23 writings and documents in evidence additionally reflect
24 his egoism, greed, avarice, lust for power, and
25 vindictiveness and aggressiveness against persons
26 perceived by him to be disloyal or hostile." (Ex.D,
27 8:18-9:4).

28 21. Between the 1984 Breckenridge decision and December,
1986 settlement, the organization's campaign against me included

1 at least these acts: attempted entrapment; illegal videotaping;
2 breaking into my car and theft of personal writings and art;
3 filing false criminal charges against me with the Los Angeles
4 District Attorney; filing false criminal charges against me with
5 the Boston office of the FBI; filing false declarations to bring
6 contempt of court proceedings against me on three occasions;
7 obtaining perjured affidavits from English private investigators,
8 who had harassed me in London in 1984, which falsely accused me
9 of distributing "sealed" documents; international dissemination
10 of Scientology publications falsely accusing me of crimes,
11 including crimes against humanity; culling and disseminating
12 information from my supposedly confidential "auditing"
13 (psychotherapy) file. I know that the attempted entrapment,
14 illegal videotaping, and filing false charges with the LA DA all
15 involved Eugene Ingram, who had been thrown out of the Los
16 Angeles Police Department for allegedly pandering and taking
17 payoffs from a drug dealer. In the fall of 1984 Mr. Ingram
18 called me and threatened to "put a bullet between [my] eyes."

19 .22. The circumstances leading up to and at the time of my
20 signing of the December, 1986 "settlement agreement" make
21 understandable why I would sign such a bizarre document. I had
22 prevailed overwhelmingly in the defense side of Armstrong I. My
23 cross-complaint against Scientology was set to go to trial in
24 early 1987. Lawrence Wollersheim had in July, 1986, obtained a
25 twenty-five million dollar jury verdict against Scientology, also
26 in LA Superior Court. By December, 1986 I had weathered five
27 years of fair game. Michael Flynn, my attorney and employer, who
28 had represented me throughout Armstrong I, had been Scientology's
fair game target for seven years. The organization had sued him

1 and/or his office more than a dozen times in various
2 jurisdictions. The organization had "black PRed" him around the
3 world; infiltrated his office; stolen documents; contacted and
4 paid known criminals for statements falsely accusing him of
5 crimes (for a glimpse, see, e.g., U.S. v. Kattar, 840 F.2d. 118);
6 paid some of his former clients to execute false sworn statements
7 attacking him; framed him with an attempt to cash a forged check
8 on one of L. Ron Hubbard's bank accounts; and attempted to bring
9 false criminal charges against him. He expressed in many ways an
10 abiding concern that his family was at physical risk. Eugene
11 Ingram was involved in and largely responsible, as Scientology's
12 paid agent, for framing Mr. Flynn and attempting to have him
13 charged criminally. Mr. Flynn several times made the statement
14 to me, and publicly to hundreds of others, that he believed
15 Scientology had attempted to have him killed by tampering with
16 his private plane. He filed his own lawsuits against Scientology
17 and Mr. Hubbard in response to the fair game attacks.

18 23. During the years the organization carried out its war
19 on Mr. Flynn, organization lawyers had communicated and met with
20 him on a number of occasions regarding settling his and his
21 clients' cases. I knew that such meetings occurred because I was
22 one of those clients from early 1982 and I had worked for Mr.
23 Flynn from September, 1985 through 1986 in his office in Boston.
24 Around the beginning of December, 1986 Mr. Flynn called from Los
25 Angeles, where he was meeting with Scientology's lawyers to say
26 that a "global settlement" had been reached. He already had my
27 agreement on a monetary figure for which I would settle my
28 lawsuit. He was to be paid a lump sum which he was to divide
between his clients and himself.

1 24. I have in the past waived my attorney-client privilege
2 as to my conversations with Mr. Flynn at the time of and
3 concerning the "global settlement," and I again waive that
4 privilege as to those conversations. I have stated these facts
5 in several declarations since 1990. On December 5, 1986 I was
6 flown to Los Angeles, as were several other of Mr. Flynn's
7 clients from various places, to participate in this settlement.
8 Shortly after my arrival in LA I was shown a copy of the
9 "settlement agreement" (identical in all important respects to
10 Exhibit C hereto) and some other documents, which Mr. Flynn
11 indicated I was to sign.

12 25. Upon reading the settlement agreement draft I was
13 shocked and heartsick. I told Mr. Flynn that the condition of
14 "strict confidentiality and silence with respect to [my]
15 experiences with the [organization]" (Ex. C, ¶7D), since it
16 involved over seventeen years of my life, was impossible. I told
17 him that the "liquidated damages" clause (Ex. C, ¶7D) was
18 outrageous; that pursuant to the settlement agreement I would
19 have to pay \$50,000.00 if I told a doctor or psychologist about
20 my experiences from those years; or if I put on a resume what
21 positions I had held during my organization years. I said that
22 if I went on a date and the woman of my dreams asked me where had
23 I been all her life, I'd have to pay Scientology \$50,000 if I
24 dared to tell her. I told Mr. Flynn that the requirements of
25 non-amenability to service of process (Ex. C, ¶7H) and non-
26 cooperation with persons or organizations adverse to the
27 organization (Ex. C, ¶¶7G, 10) were obstructive of justice. I
28 told him that I felt that agreeing to leave the organization's
appeal of the decision in Armstrong I and not respond to any

1 subsequent appeals (Ex. C, ¶4B) was unfair to the courts and all
2 the people who had been helped by the decision. I told Mr. Flynn
3 that an affidavit the organization was demanding that I sign
4 along with the settlement agreement was false. The document
5 stated, inter alia, that my disagreements with the organization
6 had been with prior management and not with the then current
7 leadership. In fact there had been no management change and I
8 had the same disagreements with the organization's "fair game"
9 policies and actions, which had continued without change up to
10 the time of the settlement. I told Mr. Flynn that I was being
11 asked to betray everything and everyone I had fought for against
12 organization injustice. It was as if no more restrictive,
13 insulting, mean spirited, impossible and immoral an "agreement"
14 could have possibly been "negotiated" on my behalf.

15 26. In answer to my objections to the settlement agreement
16 Mr. Flynn said that the silence and liquidated damages clauses,
17 and anything which called for obstruction of justice were "not
18 worth the paper they're printed on." He said the same thing a
19 number of times and a number of ways; e.g., that "you cannot
20 contract away your Constitutional rights;" that "the conditions
21 are unenforceable." He said that he had advised the organization
22 attorneys that those conditions in the settlement agreement were
23 not worth the paper they were printed on, but that the
24 organization, nevertheless, insisted on their inclusion in the
25 settlement agreement and would not agree to any changes. He
26 pointed out the clauses concerning my release of all claims
27 against the organization to date and its release of all claims
28 against me to date (Ex. C, ¶¶1,4,5,6 and 8) and said that they
were the essential elements of the settlement and "are what

1 they're paying you for."

2 27. Mr. Flynn also said that everyone was sick of the
3 litigation and wanted to get on with their lives. He said that
4 he was sick of the litigation, the threats to him and his family
5 and wanted out. He said that as a part of the settlement he and
6 all co-counsels had agreed to not become involved in
7 organization-related litigation in the future. He expressed a
8 deep concern that the courts in this country cannot deal with the
9 organization and its lawyers and their contemptuous abuse of the
10 justice system. He said that if I didn't sign the documents all
11 I had to look forward to was more years of harassment and misery.
12 One of Mr. Flynn's other clients, who was in the room with us
13 during this discussion, yelled at me, accusing me of killing the
14 settlement for everyone, and that everyone else had signed or
15 would sign, and everyone else wanted the settlement. Mr. Flynn
16 said that the organization would only settle with everyone
17 together; otherwise there would be no settlement. He did agree
18 to ask the organization to include a clause in my settlement
19 agreement allowing me to keep my creative works relating to L.
20 Ron Hubbard or the organization (Ex. C, ¶7L).

21 28. Mr. Flynn said that a major reason for the settlement's
22 "global" form was to give the organization the opportunity to
23 change its combative attitude and behavior by removing the threat
24 he and his clients represented to it. He stated that the
25 organization had promised that if we settled they would cease all
26 fair game. He argued that the organization's willingness to pay
27 us substantial sums of money, after its agents and attorneys had
28 sworn for years to pay us "not one thin dime," was evidence of a
philosophic shift within the organization. I argued that the

1 settlement agreement evidenced the unchanged philosophy of fair
2 game, and that if the organization did not use the opportunity to
3 transform its antisocial nature and actions toward its members,
4 critics and society I would, a few years hence, because of my
5 knowledge of organization fraud and fair game, be again embroiled
6 in its litigation and targeted for extralegal attacks.

7 29. Regarding the affidavit the organization required that
8 I sign, Mr. Flynn said that the "disagreement with prior
9 management" could be rationalized as being a disagreement with L.
10 Ron Hubbard, and since Mr. Hubbard had died in January 1986 it
11 could be said that I no longer had that disagreement. Mr. Flynn
12 said that the organization's attorneys had promised that the
13 affidavit, which he said all the settling litigants were signing,
14 would only be used by the organization if I began attacking it
15 after the settlement, and since I had no intention of attacking
16 the organization the affidavit would never see the light of day.

17 30. During my meeting with Mr. Flynn in Los Angeles I found
18 myself facing a dilemma which I reasoned through in this way. If
19 I refused to sign the settlement agreement and affidavit, all the
20 other settling litigants, many of whom had been flown to Los
21 Angeles in anticipation of a settlement, would be extremely
22 disappointed and would continue to be subjected to organization
23 harassment for an unknown period of time. I had been positioned
24 in the settlement drama as a deal-breaker and would undoubtedly
25 lose the support of some if not all of these litigants, several
26 of whom were key witnesses in my case against the organization.
27 Although I was certain that Mr. Flynn and my other lawyers would
28 not refuse to represent me if I did not sign the documents I also
knew that they all would view me as a deal-breaker and they would

1 be as disappointed as the other litigants in not ending the
2 litigation they desperately wanted out of. The prospect of
3 continuing the litigation with unhappy and unwilling attorneys on
4 my side, even though my cross-complaint was set for trial within
5 three months, was distressing. On the other hand, if I signed
6 the documents, all my co-litigants, some of whom I knew to be in
7 financial trouble, would be happy, the stress they felt would be
8 reduced and they could get on with their lives. Mr. Flynn and
9 the other lawyers would be happy and the threat to them and their
10 families would be removed. The organization would have the
11 opportunity they said they desired to clean up their act and
12 start anew. I would have the opportunity to get on with the next
13 phase of my life and the financial wherewithal to do so. I was
14 also not unhappy to at that time not have to testify in all the
15 litigation nor to respond to the media's frequent questions. If
16 the organization continued its fair game practices toward me I
17 sensed that I might be left to defend myself and I accepted that
18 fact. So, armed with Mr. Flynn's advice that the conditions I
19 found so offensive in the settlement agreement were not worth the
20 paper they were printed on, and the knowledge that the
21 organization's attorneys were also aware of that legal opinion, I
22 put on a happy face and the following day went through the
23 charade of a videotaped signing. I believe I was guided by God
24 in making the legally ill-advised decision to sign Scientology's
25 documents. This secret scheme to corrupt Justice is now seen as
26 the evil it is in large part because of Scientology's insistence
27 that Justice's corruption was its right.

28 31. It was my understanding and intention at the time of
the settlement that I would honor in a sensible way the silence

1 and confidentiality conditions of the settlement agreement. I
2 would not contact the media about Scientology, publish my
3 Scientology history or file statements in court concerning
4 Scientology. It was also my understanding that the organization
5 had agreed to do likewise; i.e., it would not contact the media
6 about me, publish my Scientology history or file statements in
7 court concerning me. Although the "settlement agreement" did not
8 specifically prohibit Scientology from communicating about me, it
9 implied a reciprocity, and I knew that if it did communicate I
10 would be free to respond. That Scientology would be able to say
11 whatever it wanted about me to the media, in publications, to
12 governments, and in judicial or administrative proceedings, and
13 could judicially prosecute me if I responded was, at that time
14 and in this country, inconceivable to me.

15 32. A few weeks after the "settlement" I was advised by a
16 Los Angeles Times reporter that Scientology agents had delivered
17 a stack of documents about me to the paper. Although shocked by
18 this action, which was out of the blue because I had said or done
19 nothing about Scientology after the "settlement," I did not
20 respond. Following the settlement, and before I responded in any
21 public way, Scientology subjected me to considerable fair game,
22 which included filing affidavits falsely accusing me of crimes
23 and of being an "agent provocateur of the United States
24 government;" publishing distorted versions of my Scientology
25 history; using documents which the organization had requested be
26 sealed in Armstrong I to attack me; distributing dead agent packs
27 of documents concerning me to the media; distributing copies of
28 edited versions of the illegal videotapes of me to the media
internationally; blackmail; and threatening me six times with

1 being sued if I responded to any attacks. Scientology also
2 continued to subject other people to fair game, in violation of
3 its promise through Mr. Flynn that it was ceasing all fair game
4 activities. The person who in the fall of 1987 delivered
5 documents concerning me and a doctored and edited copy of the
6 1984 illegal videotape of me to the London Sunday Times was
7 Eugene Ingram.

8 33. For three years I attempted to live by the spirit of
9 settlement, and, although threatened and saddened by
10 Scientology's continuing attacks, did not respond, but had tried
11 to live my life away from Scientology's war. I wrote, drew, ran,
12 had remarkable ideas, and formed The Gerald Armstrong Corporation
13 ("TGAC") with wonderful hopes and great expectations. In late
14 1989, however, after a series of threats from Scientology lawyer
15 Lawrence Heller, following my being served with a deposition
16 subpoena in the case of Bent Corydon v. Scientology, Los Angeles
17 Superior Court No. C 694401, I concluded that I had to do
18 something to defend myself. I saw that I could not avoid a
19 confrontation with the organization, and that there was a need to
20 correct what I knew was as an obstruction of justice, that the
21 settlement contracts and Scientology's enforcement thereof were
22 working in the legal arena. Mr. Heller threatened that if I
23 testified about my knowledge of Hubbard and Scientology, even
24 though I had been subpoenaed to testify, Scientology would
25 consider such testimony a breach of the "contract" and would sue
26 me.

27 34. I researched my rights and responsibilities and
28 concluded that I had a duty to oppose known obstruction of
justice. I also learned at that time that Scientology had been

1 able to maintain an appeal from the Breckenridge decision in the
2 California Court of Appeal and had just then filed its opening
3 brief. I therefore petitioned that Court to be able to file a
4 response. My filings in the Court of Appeal in 1990 included a
5 declaration detailing and documenting Scientology's post-
6 settlement torts and violations, and a declaration detailing the
7 circumstances at the time of the 1986 settlement. The Court of
8 Appeal granted my petition, I filed a respondent's brief, and in
9 July, 1991 the Court affirmed the Breckenridge decision.
10 Following the California Supreme Court's denial of review,
11 Scientology filed a motion in the Court of Appeal to seal the
12 record on appeal. I opposed the motion, and the Court of Appeal
13 denied it. The complete trial transcript, which contains ten
14 days of my testimony about my Scientology experiences up to 1984,
15 is a public document.

16 35. In August, 1990 I was greatly moved by the buildup
17 toward war in the Middle East, and the general condition of man.
18 I prayed to God for guidance as to what I should do, and received
19 the word: "Keep nothing. Give what you have to the poor. Take
20 only what you need." I gave my possessions to those whom I
21 believed had a need for them as put in my heart by God, forgave
22 debts owed to me, and determined to go where God would have me go
23 and do what God would have me do; which I believed was to help
24 where my help was asked for. Although these decisions had
25 nothing to do with Scientology, the organization has made them
26 relevant in the legal arena by suing me and three of my friends,
27 falsely charging that my giving away my things were "fraudulent
28 conveyances" to make myself "judgment proof" so I could breach
its "settlement agreement." For the next year after my

1 renunciation God had me, among other things, offer myself to
2 resolve the Middle East conflict, do some house painting and
3 carpentry work, deal with the pending appeal, attempt to correct
4 Scientology's subversion of the legal system, agree to help the
5 victims of Scientology who asked for my help, and offer myself to
6 resolve the Scientology conflict in which I had been drawn by its
7 attacks.

8 36. Scientology's fair game attacks on me following my
9 responding in its appeal of the Breckenridge decision include,
10 but are not limited to, secretly videotaping me; suing me and
11 TGAC (pronounced "Teegeeack") four times (Marin Superior Court
12 Case No. 152229, transferred to Los Angeles Superior Court and
13 given No. BC 052395 ("Armstrong II"), Los Angeles Superior Court
14 Case No. BC 084642 ("Armstrong III"), Marin Superior Court Case
15 No. 157680 ("Armstrong IV," the "fraudulent conveyance" case),
16 United States Bankruptcy Court for the Northern District of
17 California Case No. 95-10911 aj, Adv. No. 95-1164 aj ("Armstrong
18 V"); Armstrong II, III and IV were consolidated into Marin SC No.
19 157680); attempting to have me jailed for contempt of court based
20 on Scientology's misrepresentation of my actions and its own
21 manufactured charges; filing declarations in various courts
22 containing false charges, and using the "settlement agreement" to
23 prevent me from responding or punish me for responding; using
24 Eugene Ingram to spread the false rumor in 1992 that I have AIDS;
25 forcing me into bankruptcy; attempting to seize my artwork, and
26 personal and intellectual property through judicial means based
27 on false charges; disseminating to the media packs of black PR
28 which provide Scientology's false version of my experiences,
including the lies that I testified falsely at trial in 1984;

1 that I have "adopted a degraded lifestyle;" that I am connected
2 to a referral agency for kidnapping; that my defense in the 1984
3 trial was a sham and a fraud; that the Los Angeles Police
4 Department authorized the illegal 1984 videotaping; that I wanted
5 to plant fabricated documents in Scientology files and tell the
6 IRS to conduct a raid; that I wanted to plunder Scientology for
7 my own financial gain; that I never intended to stick to the
8 terms of the "settlement contract;" that my motives are money and
9 power; that I was incompetent as a researcher; that I perjured
10 myself about surrendering documents to the court; that I wanted
11 to orchestrate a coup in which members of the US government would
12 wrest control of Scientology; publishing black propaganda about
13 me without stating its source which provide Scientology's false
14 version of my experiences including the lies that I was formerly
15 a heavy drug pusher; that a Marin Independent Journal photo
16 showed me in the nude; that I am psychotic and live in a delusory
17 world; charging falsely in a letter to the press that I had
18 distinguished myself by posing naked in a newspaper; attempting
19 to cause me trouble with the IRS by writing black propaganda
20 letters about me; distributing packs of black propaganda which
21 attacked my lawyer Ford Greene, and Judge Breckenridge.

22 37. I worked with attorney Greene from August, 1991 through
23 December, 1995, except for about three weeks in April, 1995.
24 Throughout that period Scientology attempted overtly through
25 misuse of the courts and covertly through its Office of Special
26 Affairs ("OSA"), the organization's intelligence arm, along with
27 other operatives, to prevent me from working with Mr. Greene and
28 from defending myself. Scientology employed a covert operative,
Garry Scarff, whom it had infiltrated into Mr. Greene's office,

1 to develop a black PR "attack line" that Mr. Greene and I were
2 involved in a homosexual relationship. Scientology has subjected
3 Mr. Greene to years of fair game, which included having Scarff,
4 while in his office, steal his office records and cause trouble;
5 concocting a plot with Scarff to have him killed; having Scarff
6 execute false declarations about Mr. Greene; filing five spurious
7 bar complaints against him; operating at least two of his
8 clients, Richard and Vicki Aznaran, as Scientology's own agents,
9 and paying them to execute false declarations against Mr. Greene
10 and breach their contract with him. Scientology was able to
11 achieve one of its desired goals with the Thomas order, Ex. A,
12 which made my working with Mr. Greene threatening and virtually
13 impossible. I have been denied two other good jobs in the past
14 year because of my relationship to the Scientology organization
15 and the threat that goes with it. I have within the past week
16 learned from Mr. Greene that his office was recently burglarized
17 and my office file stolen along with other important legal files.
18 Eugene Ingram has been involved in the attacks on Mr. Greene, has
19 harassed his friends, and sought by "legal" and illegal means to
20 prevent him from effectively litigating against Scientology.

21 38. Throughout its post-settlement judicial attacks on me
22 Scientology has proclaimed that by the "settlement agreement" it
23 sought peace. Scientology also interprets the "agreement" to
24 mean that it can say whatever it wants about me, no matter how
25 false, obnoxious or evil and that I may not respond. The
26 organization has indeed said whatever it wanted to about me,
27 falsely accusing me of crimes and attacking my character and
28 credibility. Scientology claims that if I do respond in any way
I am liable for \$50,000 in liquidated damages, and may be jailed.

1 Scientology, under David Miscavige, has filed bogus lawsuits and
2 been able to get Marin Superior Court Judge Gary W. Thomas for
3 bogus reasons to give them an unreasonable interpretation of the
4 agreement and an unreasonable judgment. Judge Thomas has stated
5 that essentially Scientology may say whatever it wants and I may
6 not respond. Because of, inter alia, what that kind of decision
7 and reasoning portends for Lady Justice, and because the silence
8 of bells too cannot be unring, I have not succumbed quietly.

9 39. Through the decade of Scientology's legal attacks on me
10 after the December, 1986 "settlement," it has intimidated Mr.
11 Flynn into not coming forward to assist me. He was not only my
12 attorney, he was my good friend. He now says that the contract
13 is evil, that Scientology is evil and he wants to help me. He
14 also says that he signed a "contract" with Scientology, which I
15 was unaware of at the time of the "settlement," which
16 specifically prevents him from assisting me. While acknowledging
17 that this "contract" is illegal, he says that he knows that his
18 life will be ruined even more than it has been by Scientology if
19 he comes forward to help.

20 40. I believe that Scientology's interpretation of the
21 "settlement agreement," to which Judge Thomas has added the
22 authority of the California courts, is unconscionable and
23 unamerican. Because there are dozens of these "contracts" among
24 first hand witnesses to Scientology's criminal and tortious
25 practices, and because of Scientology's fair game use of the
26 "settlement agreement" against me, I believe that a terrible
27 injustice is being abetted by our courts, which should be opposed
28 with all strength. In my opinion, that one party to a settlement
contract, which is supposed to be essentially a peace accord, is

1 able to continue to shoot at the other party, who is wounded, has
2 been disarmed and is not being allowed to defend himself in any
3 way, is not peace at all but a demonic hunting trip. The
4 "settlement agreement," and now the judgment enforcing it, are in
5 this "civilized society," licenses for hunting humans.

6 41. I was paid in settlement by Scientology for its years
7 of psychological cruelty, threat and stalking; i.e., fair game.
8 Scientology's leaders did not learn their lesson but continued
9 the cruelty, threat and stalking of a person already
10 psychologically hurt and altered beyond belief by the actions
11 they promised to cease. I performed my part of the 1986
12 settlement. I dismissed my cross-complaint, released to
13 Scientology all evidence from my case, removed myself from
14 controversy, and gave Scientology the time and freedom it said it
15 wanted to cease fair game. Scientology's leaders, knowing that
16 they had compromised and removed my attorney, failed to perform
17 their part of the settlement, but continued fair game against me
18 after they had psychologically wounded me and, they thought,
19 rendered me defenseless.

20 42. In 1991 I became a Christian. I had, in the years
21 after leaving Scientology, come to recognize that I was guided by
22 God, and I sought to be guided in all circumstances in which I
23 found myself. Once its adherents become sufficiently
24 brainwashed, Scientology does not permit them to believe in God,
25 labels and treats anyone who believes in God as "psychotic," and
26 enforces the satanic idea that God is an "implant," a false idea
27 installed by pain and electronics in man's mind to enslave him.
28 Scientology also teaches that Jesus Christ, the whole Gospel
story, and Heaven are implants designed to enslave man, and that

1 only Scientology has the way to free mankind from this
2 enslavement.

3 43. Scientology promotes to Christians and non-Christians
4 that it is compatible with Christianity, that it holds the Judeo-
5 Christian Bible as a holy work, and that it has no argument with
6 the belief that Jesus Christ was the Savior of Mankind and Son of
7 God. Scientology has distributed promotional materials
8 containing these representations to every member of Congress, to
9 libraries, to the media, to educators, to judges, and to people
10 of influence across this country. Scientology withholds from the
11 public its actual enforced beliefs about God, Christ, Heaven and
12 the Bible. I believe this is religious fraud, and dangerous to
13 everyone lured into Scientology, those already held by its
14 brainwashing system, and society itself. I also believe that
15 Scientology's "creed" is a religious fraud because Scientology,
16 under Hubbard's and Miscavige's control, has never acted in
17 accord with it. Scientology systematically abuses its members'
18 civil rights, and seeks to destroy the same civil rights of its
19 non-Scientologist "enemies."

20 44. Scientology promotes actively and aggressively and uses
21 the public postal system, public forums and public media for its
22 promotions. Scientology is a public figure. It uses its
23 resources to affect legislation and to violate people's civil
24 rights. Its efforts to judicially and extra-judicially silence
25 and destroy me are clear examples. I believe that this is not a
26 legal purpose and not a purpose for which tax-exempt funds can
27 legally be used. I see that Scientology tricks and extorts huge
28 sums of money from people it lures into its system for something
of no value. This money will be used to pay lawyers to attack

1 the same people and those who seek to bring to light or curtail
2 the abuse. I have proof that Scientology obtained its tax-exempt
3 status in 1993 by illegal means. I believe that the Internal
4 Revenue Service and the United States government agencies
5 responsible were derelict in their duties in granting such tax
6 exempt status.

7 45. The documents attached hereto as Exhibits E, F and G
8 show Scientology's use of the "settlement agreement" to skew (and
9 skewer) justice. Exhibit E is a true and correct copy of a
10 declaration executed February 8, 1994 by organization leader
11 David Miscavige and filed in the case of Scientology v. Fishman
12 and Geertz, US District Court for the Central District of
13 California, Case No. CV 91-6426 HLH(Tx). Mr. Miscavige devotes a
14 paragraph to attacking and lying about me, although I had never
15 up to that time filed any statement in the Fishman case. (Ex. E,
16 31:22-32:14) In response to this attack and to provide the truth
17 underlying Mr. Miscavige's false charges I filed in Fishman a
18 declaration executed February 22, 1994, a true and correct copy
19 of which, along with true and correct copies of the exhibits
20 thereto, is attached hereto as Exhibit F. Shortly thereafter
21 Scientology moved to seal certain documents in the Fishman court
22 file, one of which was my February 22 declaration. In response
23 and in opposition to this motion I wrote and filed a declaration
24 executed April 21, 1994, a true and correct copy of which,
25 without the exhibits thereto, is attached hereto as Exhibit G.
26 Scientology sued me for these declarations, charging that they
27 were "breaches" of its "settlement agreement," and claiming
28 \$50,000 liquidated damages for each. My "voluntary assistance"
to defendants Fishman and Geertz by way of these declarations is

1 referred to in the Thomas order at Ex. A, 4:8-11. Correcting of
2 the Miscavige lies and preventing my own words from being sealed
3 was impossible "involuntarily" because discovery was already
4 closed in the Fishman case. Even if discovery was still open
5 there was not sufficient time to go through the ritual of being
6 served, opposing Scientology's motions to prevent the deposition
7 from going forward, combatting Scientology's obstructionist
8 lawyers in deposition, and waiting for the deposition transcript.
9 In my opinion, Mr. Ward is in a similar position: even if he
10 could afford to pay a court reporter, there is not time enough to
11 obtain the needed testimony before it is needed. For this reason
12 alone I believe non-assistance "contracts" such as those
13 Scientology uses must be ruled illegal.

14 46. That Scientology will move to block the depositions of
15 people who signed its "settlement agreements" is shown by
16 Scientology's "motion ... to delay or prevent the taking of
17 certain third party depositions," a true and correct copy of
18 which is attached hereto as Exhibit H. Scientology filed this
19 motion in the Corydon litigation after I was served in the case
20 with a deposition subpoena. The motion is based on a declaration
21 by Scientology attorney Lawrence Heller executed November 1,
22 1989, a true and correct copy of which is also attached hereto as
23 part of Exhibit H. In this declaration Mr. Heller states that
24 "The non-disclosure obligations were a key part of the settlement
25 agreements insisted upon by all parties involved." (Ex. H, 9:5-
26 7) Mr. Heller also states in the memorandum of points and
27 authorities: "One of the key ingredients to completing these
28 settlements, insisted upon by all parties involved was strict
confidentiality respecting: ... any knowledge possessed by the

1 Scientology entities concerning those staff members of[^]
2 parishioners." (Ex. H, 4:9-14) Mr. Heller was of course lying,
3 because Scientology had by then disseminated mountains of post-
4 settlement black PR about me possessed by the organization. He
5 was also lying about the reciprocity of the non-disclosure
6 conditions because Scientology enforced its "settlement
7 agreement" with me on that basis of its being able to say
8 whatever it wanted about me but I must remain silent. Judge
9 Thomas's refusal to deal with or even acknowledge attorney
10 Heller's lies and Scientology's inconsistent statements
11 concerning reciprocity, even though these were carefully
12 pointed out to him in my papers filed in the cases before him, I
13 believe is an indicator of Scientology's corruption of the
14 judicial process.

15 47. That Scientology will also subvert our courts' power to
16 prosecute "contempt" is shown in its "application for order to
17 show cause why Gerald Armstrong should not be held in contempt,"
18 filed December 31, 1992 in Armstrong II. A true and correct copy
19 of the application and Scientology's supporting documents is
20 attached hereto as Exhibit I. Scientology filed another
21 application for an OSC re contempt shortly after this one,
22 charging that my providing a declaration to Lawrence Wollersheim
23 in the case of Scientology v. Wollersheim, Los Angeles Superior
24 Court Case No. BC 074815, was a violation of its "injunction."
25 Scientology's charges were either misrepresentations of my
26 actions or completely manufactured. Ultimately Judge Diane Wayne
27 discharged all of Scientology's contempt charges in a ruling
28 dated July 28, 1994, a true and correct copy of which is attached
hereto as Exhibit J. I do not believe I will receive equally

1 fair treatment from Judge Thomas, and I am at great risk of
2 Scientology being successful before him in its pressing to have
3 me jailed. I wrote a declaration in opposition to Scientology's
4 contempt charges, and the organization deemed that declaration
5 itself a violation of the "settlement agreement." I do not have
6 immediate access to that declaration, and many of my legal
7 papers, but I will be able to provide it and any other documents
8 in the near future if requested. The documents I am attaching as
9 exhibits to this declaration are a small fraction of the
10 materials I have which show Scientology's malevolent side and its
11 dedication to and employment of fair game.

12 48. Attached hereto as Exhibit K is a true and correct copy
13 of an article from the Boston Globe dated November 24, 1979
14 concerning Scientology's fair gaming of writer Paulette Cooper,
15 and mentioning other organization intelligence ops.

16 49. Attached hereto as Exhibit L is a true and correct copy
17 of a series of articles from the Oregonian dated from March 28,
18 1985 through May 24, 1985 covering the trial of Julie
19 Christofferson against Scientology in Portland, Oregon. The
20 April 5, 1985 article contains the statement concerning the
21 illegally obtained videotapes of me: "'I think they are
22 devastating, devastating against the church,' Multnomah Circuit
23 Judge Donald H. Londer said." The May 18, 1985 article announces
24 the jury's award of thirty-nine million dollars to Ms.
25 Christofferson.

26 50. Attached hereto as Exhibit M is a true and correct copy
27 of an article from the Los Angeles Times announcing Judge
28 Londer's declaring a mistrial, a month after the jury rendered
its verdict.

1 51. Attached hereto as Exhibit N is a true and correct copy
2 of a series of articles from the Toronto Star and the Toronto Sun
3 dated from March 12, 1992 through April 30, 1992 covering a \$1.6
4 million damage award to Crown Prosecutor Casey Hill whom
5 Scientology and its lawyers libeled, and the trial of Scientology
6 in Toronto, Canada for spying and theft.

7 52. Attached hereto as Exhibit O is a true and correct copy
8 of an article from the Denver Post dated November 23, 1996
9 concerning the conviction of the head of Scientology in Lyon,
10 France for subjecting a man to "psychological torture" resulting
11 in his suicide.

12 53. Attached hereto as Exhibit P is a true and correct copy
13 of an article from the San Francisco Chronicle dated December 26,
14 1996 concerning Germany's efforts to control Scientology's abuses
15 and Scientology's attack on Germany.

16 54. These articles, which are but a small fraction of the
17 press around the world critical of Scientology, also support the
18 invalidation of the Scientology's "settlement agreements" and the
19 Thomas order. It is entirely wrong that anyone be denied
20 participation in a public controversy of this magnitude, a public
21 controversy concerning national sovereignty and national security
22 decisions.

23 55. It is also wrong, and I believe constitutionally
24 impermissible, to deny anyone freedom of religion by "contract"
25 or court order. The Thomas order prohibits me from "discussing
26 ... Scientology, the Church, and/or any of the Beneficiaries;"
27 (Ex. A, 8:14-16) If such a prohibition is legal concerning
28 Scientology, a parallel prohibition would be legal concerning,
for example, Christianity, God, and any religious experience of

1 any kind. The idea that this country's courts can give a
2 "church" \$50,000 in liquidated damages and send someone to jail
3 for his discussing God or Christ or the Holy Scriptures, is of
4 course absurd. Who but evil itself would hatch such an idea?
5 Scientology's "settlement agreement," its efforts to enforce, and
6 the Thomas order are no less absurd, and no less evil's idea.
7 Suppression of critics of a religion through judicial means is a
8 violation of the Constitution's "Establishment Clause," and the
9 Religious Freedom Restoration Act of 1993. Michael Flynn did not
10 have my permission to sell Scientology my freedom of religion
11 (nor any of the other personal freedoms I possessed and enjoyed
12 before the "settlement"), and even if I had given him such
13 permission he could not sell it. It cannot be sold. Scientology
14 couldn't buy it. It cannot be bought. Scientology claims it
15 purchased my freedom of religion, in fact claims that it paid me
16 eight hundred thousand dollars for it, but it could not have. If
17 it paid \$800,000.00 for something it couldn't buy, receive or
18 possess it paid way too much. In reality, and I would think
19 happily for Scientology, it received from me the dismissal of my
20 cross-complaint, my accumulated evidence of its fraud and
21 criminality, and my sincere efforts to let there be peace. Thus
22 it got a terrific deal, and its whining that I wouldn't sell what
23 it couldn't buy is silly.

24 56. Freedom of religion without freedom to discuss religion
25 and religious experience is impossible. Scientology insists that
26 the world accept that it is a religion. It asserts in its "bona
27 fides," indeed in the submissions upon which it was able to get
28 the US Government to give it tax-empt status, that it is
organized solely for religious purposes. The experiences of its

1 members inside and in relationship to the organization, its
2 founder, its "scriptures," its practices and its other members
3 must therefore be religious experiences. In my opinion, as long
4 as Scientology maintains that it is a religion it cannot legally
5 prohibit, by judicial means in this country's courts, anyone from
6 discussing anything about it. In my opinion, since Scientology
7 insists on binding its members with "non-disclosure bonds" and
8 similar "contracts," and binding its former members or targeted
9 "enemies" with "settlement agreements" like Exhibit C hereto, it
10 cannot be a religion; i.e., it cannot have it both ways.

11 57. In my opinion, the exposing or dissemination of
12 Scientology's "sacred scriptures," which is at issue in the Ward,
13 Henson and Erlich cases, as well as in the Lerma and Factnet
14 cases, is an analogous situation in which the same greater
15 principle of religious freedom applies. An entity which claims
16 to have secret writings, which people to see must pay and agree
17 to not discuss, cannot actually be a religion, because such a
18 policy on its face restricts or prohibits religious expression.
19 Such an entity can be a "secret-selling company," or some such,
20 in competition with other secret-selling companies, as long as it
21 does not try to claim that the secrets it sells are "religious"
22 secrets. Practically speaking, the only time this would become
23 an issue is if an entity claiming to be a religion attempted to
24 judicially prohibit the publication of its religious secrets or
25 judicially punish their publishers. Obviously people have the
26 normal secrets that normal people have, and people talk about
27 them and keep them or not, and so forth. A real religion would
28 have no reason to prevent the publication of its scriptures, and
it would possess no "secret scriptures." In my opinion, whoever

1 has published Scientology's "secret scriptures" has in reality
2 only been engaging in religious expression. In my opinion this
3 kind of expression is an expected, logical response to
4 Scientology's efforts to corrupt the meaning of religion to
5 "sanctify" its antisocial and dangerous mindset and criminal
6 activities. It is expression which cannot legally be prohibited
7 or punished by judicial process.

8 58. In my observation, Mr. Ward, Mr. Wollersheim, Mr.
9 Henson, Mr. Erlich, Mr. Lerma and Mr. Penny (hereinafter,
10 "WWHELP") are in general agreement that Scientology is not a
11 sincere, and hence real, religion but is a criminal cult engaged
12 in harmful practices. In my opinion, if WWHELP are correct in
13 their assessment, and if they did expose or publish Scientology's
14 secret documents, they were and are completely justified in
15 having done so. It goes without saying that criminal cults, or
16 any criminal enterprises for that matter, are against public
17 policy. It is certainly conceivable that writings which direct
18 criminal cult members to think a certain way and perform certain
19 acts in order to rise within the criminal cult's hierarchy, or
20 become more criminal, are also against public policy. In my
21 opinion a reasonable person who has been presented with the facts
22 about Scientology that each of the alleged publishers possessed
23 at the time the publications were made would have believed that
24 the prosecution of anyone pursuant to trade secret or copyright
25 law for the publication of such writings is itself against public
26 policy. Thus Scientology's actual nature is relevant to WWHELP's
27 defenses. If Scientology is a religion, then WWHELP are
28 justified in their religious expression. In my opinion, for
Scientology to now "become" a religion, among the other things it

1 must do, it must cease its judicial persecution of anyone for his
2 religious expression, even if that be criticism, publication or
3 sworn testimony. Scientology must otherwise, in my opinion, be
4 seen as electing to remain a criminal cult, and must in these
5 matters have our courts' ears shut to it, in limine.

6 59. This Court stated in its order dated January 6, 1997
7 filed in the Erlich case:

8 "The relevant inquiry is whether the documents for which
9 trade secret protection is sought are "'generally known' to
10 the relevant people -- the potential 'competitors' of the
11 Church." [site] Nevertheless, defendant has not established
12 the extent to which the specific processes and instructions
13 contained in the works are known generally or to potential
14 competitors.

15 "How to identify "potential competitors" is a difficult
16 question. However, members of the newsgroup "alt.religion.
17 scientology" might be considered as such." (Order, 21:10-14;
18 n.17).

19 The identification of Scientology's "potential competitors" is
20 actually not a difficult question. In accordance with a long
21 line of US Supreme Court cases touching on religious matters, a
22 court's attempting to answer such a question would, however, be
23 impermissible. It is made "difficult" only because our courts do
24 not generally, aside from rare anomalies such as "natural
25 disasters," permit themselves to ascribe causation in human
26 affairs to God. The actions of Scientology, calling itself a
27 religion and prosecuting religious expression in secular courts,
28 now make answering this question in these courts possible and
permissible. In my opinion, Scientology's actual "competitors"

1 are those whom God guides, those through whom He works to carry
2 out His purposes.

3 60. In the "religious realm," God's working in the lives of
4 people, although, to those who understand it, infinitely more
5 wonderful than any other conceivable possibility, is simply
6 what's true, at least for someone. This nation's courts have
7 dealt with this truth by insisting that within the cases over
8 which they preside the truth or falsity of religious beliefs will
9 not be questioned; in this case, whether God indeed works in
10 people's lives, and specifically whether God's guidance resulted
11 in the exposing or publication of Scientology's "secret
12 scriptures."

13 61. The guided come from any religion and from no religion.
14 They include those who seek God's guidance and those who don't
15 seek His guidance, and may not even know or care that it is
16 available. Some people may know they're called to do God's work,
17 and don't do it. Some may not know they're called but do His
18 work anyway. This is easily understandable because God has given
19 everyone a conscience and written His Laws on everyone's heart,
20 whether they know it or accept it or not. It is also easily
21 understandable that the guided would be Scientology's natural
22 "competitors" because Scientology has made a religion of
23 nonguidance; and religion is a realm in which God observably has
24 never let nonguidance triumph. Although man may attempt to keep
25 God out of his other realms, he cannot keep God out of religion,
26 because in this world it is His Realm.

27 62. Scientology does not acknowledge God's guidance, in
28 fact teaches, despite its public relations to the contrary, that
God does not exist. In his bulletin dated May 11, 1963 entitled

1 "Routine 3 Heaven," a true and correct copy of which is attached
2 hereto as Exhibit Q, L. Ron Hubbard writes that Heaven, God and
3 Christ are "implants," electronic mechanisms to entrap and
4 enslave mankind. These "religious" assertions are of course
5 blasphemous. He writes moreover about the scientific nature of
6 this "knowledge:"

7 "This HCO Bulletin is based on over a thousand hours of
8 research auditing, analyzing the facsimiles of the
9 reactive mind, and with the help of a Mark V
10 Electrometer. It is scientific research and is not in
11 any way based upon the mere opinion of the researcher.
12 This HCO Bulletin is not the result of the belief or
13 beliefs of anyone. Scientology data reflects long,
14 arduous and painstaking research over a period of some
15 thirty years into the nature of Man, the mind, the
16 human spirit and its relationship to the physical
17 universe. The data and phenomena discovered in
18 Scientology is common to all minds and all men and can
19 be demonstrated on anyone. Truth does not require
20 belief to be true any more than water requires anyone's
21 permission to run downhill. The data is itself and can
22 be duplicated by any honest researcher or
23 practitioner." (Ex. Q, at p. 4)

24 "Routine 3 Heaven" is considered by Scientology as part of its
25 "confidential Church scriptures which are protected trade
26 secrets." I possessed this bulletin inside the organization,
27 legally possess it now, and know personally at least a dozen
28 other people who now possess it.

63. In his bulletin dated September 23, 1968 entitled

1 "Resistive Cases Former Therapy," a true and correct copy of
2 which is attached hereto as Exhibit R, Mr. Hubbard writes that
3 "the Christian Churches [] uses implanting." He calls them
4 "gangsters" who "invented Christ (who comes from the crucifixion
5 in R6 75m years ago) (Hubbard's parens.) and implanted their way
6 to "power"." (Ex. R. at p. 2). This is also one of Scientology's
7 "secret scriptures," which I and many other people legally
8 possess. It, like the rest of the organization's "secret
9 scriptures," is an attack on Christianity, and blasphemous.

10 64. Scientology has its salvation "plan," its goal to
11 "clear the planet." It charges, even extorts, terrible sums of
12 money, and lies to, cheats and bullies its adherents and targeted
13 opposition. Its guiding principle is fair game, its doctrine of
14 opportunistic hatred, pursuant to which it uses the law to harass
15 its targets. God's plan on the other hand is free to everyone.
16 He guides people to tell the truth and cheat and bully no one,
17 but stand up to cheats and bullies, and stand up for their
18 targets. Scientology's leaders and God and His guided are
19 "competitors" for human souls. Scientology seeks to enslave
20 souls, while God seeks only their freedom. Other enslavers of
21 the soul work through other cons appealing to greed, lust, fear,
22 evil and the like. They all lie. No one is guided by God to
23 bind human souls with "contracts" or threats which limit their
24 expression. No one is guided by God to hate, cheat or bully, or
25 to use the law to harass. God's guidance is wisdom.
26 Scientology's guidance is stupidity; hence dangerous. The
27 exposing of dangerous cults masquerading as religions, and other
28 enslavers, is a Biblically-blessed work of the guided. Bringing
Scientology's actual nature, a facet of which is reflected in its

1 "secret scriptures," to light has arisen at this time because of
2 a certain imminence. The global nature of Scientology's threat
3 to religion, and its menace to the minds of God's children at
4 this time are observable factors. It is altogether
5 understandable that God would reach out through those who are
6 available for His work in the realm of religion. WWHELP have
7 played God-given rolls in bringing Scientology's fraud and
8 dangers to light, and they are a part of those God guides to such
9 religious expression. Some people testify, some picket, some
10 encourage, some pray, some post their stories to ars. These very
11 cool spirits may or may not believe, sense or know they are
12 guided by God. One might think Christians would be the people
13 most willing to speak out about Scientology and expose its
14 "secret scriptures," because in the realm of religion the
15 organization theologically is antichristian. I have no reason to
16 believe that any of WWHELP consider themselves Christians.
17 WWHELP in fact may have thought they exposed Scientology's
18 "secret scriptures," if they indeed did, for other reasons; e.g.,
19 that they showed it to be a criminal cult; that they are evidence
20 of practicing medicine without a license; that the exposure might
21 save someone from paying the criminal cult three hundred sixty
22 thousand dollars to get to see. In my opinion, they have done
23 God's work. Supporting that opinion is that fact that they
24 published whatever they did without any intent to gain monetarily
25 thereby. A prophet brings God's message to His children, and
26 cannot be silenced by our courts, even if he is a Prophet to
27 Scientologists.

28 65. Scientology claims to be prosecuting WWHELP for
allegedly publishing its "secret scriptures," which includes the

1 "OT materials," and the "NOTS materials." To accomplish its
2 raids and bring and maintain its lawsuits the organization has
3 asserted that the OT and NOTS materials had been kept secret, and
4 were not generally known except by its own adherents. This is
5 false. I have possessed a copy of the OT materials for many
6 years, and I know others who possessed these materials long
7 before any of the internet publications. During the Armstrong I
8 litigation I possessed a copy of the complete set of NOTS
9 materials, and I know several other people who possessed them
10 long before any were published on the internet. At the time of
11 the Armstrong I "settlement" I delivered my copy of the NOTS
12 materials to the Scientology organization. This copy should be
13 available to WWHELP through discovery in their cases. In my
14 opinion, Scientology's leaders have not brought these cases to
15 protect the "secret scriptures," because they are not secret, but
16 have used the law of trade secret and copyrights as an
17 opportunity to harass available "targets," and thus send a brutal
18 message to intimidate anyone whom God might call to stand up and
19 speak free.

20 66. Each of the WWHELP cases is being prosecuted by
21 Scientology entity RTC, which claims to own the "religion's"
22 marks, trade secrets and copyrighted materials. RTC, operated by
23 David Miscavige, is able to "legally" control the "religion," its
24 operations, personnel, communication lines, finances, lawyers and
25 agents because of this claimed ownership. In my opinion RTC did
26 not obtain this claimed ownership by legal means, and now
27 maintains such illegally ownership to the detriment of the
28 practitioners of the "religion" and society at large. It is my
understanding that David Miscavige notorized the signature of L.

1 Ron Hubbard near the time of his alleged death in 1986 on a
2 document which transferred Mr. Hubbard's ownership of certain
3 rights and/or marks from himself to RTC. While on board the
4 "Apollo" during 1972 through 1974 I was required on a number of
5 occasions to have Mr. Hubbard's signature notarized on various
6 documents. There were a couple of notaries in Portugal I got to
7 know who would verify the signature by comparison with a
8 signature in their signature book. There were times when I took
9 documents to these notaries which were not signed by Mr. Hubbard,
10 but by Joyce Popham, who could sign his signature extremely well.
11 Two of the documents signed by Ms. Popham were for the
12 registration of the marks "Dianetics" and "Scientology." The
13 forging of signatures or obtaining false notarizations is not
14 unreasonable in Scientology affairs. There is as well the more
15 serious question of Mr. Hubbard's actually not owing or
16 possessing the rights RTC says it acquired from him.

17 67. Attached hereto as Exhibit S is a true and correct copy
18 of three documents I received in late November, 1996 from Craig
19 Branch of the Watchman Fellowship, a Christian research and
20 apologetics organization and publisher. The first document is an
21 undated letter to me from Mr. Branch. The second is a letter
22 dated October 21, 1996 from Cathy Norman of Scientology's Office
23 of Special Affairs in Austin, Texas. The third document is black
24 PR on me in the form of a standard "DA document." It repeats the
25 same lies David Miscavige put in his declaration (Ex. E). See,
26 e.g., Ex. S, DA Doc, at p. 4 where Scientology asserts that "the
27 Church obtained permission from the Los Angeles Police Department
28 to conduct undercover surveillance of Armstrong, and compare with
Ex. F, and the attached public announcement of then LAPD Chief

1 Daryl Gates. According to Scientology I cannot respond to
2 correct the lies in this latest example of Scientology's black PR
3 to reach me, in this case sent to a prominent person in the
4 Christian community. Scientology is attempting with this sort of
5 attack, coupled with its "non-disclosure" contracts and orders,
6 its glossy PR, legal triumphs, etc. to rewrite history. I
7 believe Scientology's efforts to rewrite history are dangerous,
8 and my silence only abets the threat. In my opinion, Scientology
9 can never rewrite history, and it is well advised to give up the
10 effort and instead through honest change become the honest
11 organization it now tries dishonestly to get the world to believe
12 it is.

13 68. On January 23, 1996 I received in the mail from Grady
14 Ward a subpoena, a true and correct copy of which is attached
15 hereto as Exhibit T, for production of documents in his case.

16 69. On January 24 I received from attorney Andrew H. Wilson
17 a fax letter, a true and correct copy of which is attached hereto
18 as Exhibit U, threatening prosecution in Armstrong IV if I
19 provide documents to Mr. Ward pursuant to his subpoena. This
20 letter is frightening to me, and supports why I am sending this
21 declaration directly to the Court, and why the "settlement
22 agreement" and the Thomas order are illegal. Mr. Ward does not
23 have the time to wait for my testimony until Scientology's motion
24 for protective order is heard before he must file this testimony.
25 In my opinion, that is precisely why Mr. Wilson has sent his
26 threat letter. Scientology already enjoys a terribly uneven
27 playing field in its cases against WWHELP, especially against Mr.
28 Ward and Mr. Henson, who are proceeding unfinanced and undefended
by lawyers. We're kindred souls. Scientology spends millions on

1 lawyers and more millions on private investigators. Its history
2 of attacks on judges and efforts to compromise judges was known
3 to me inside the organization, and I have learned more about this
4 evil since leaving. Scientology's personnel are trained to lie,
5 and its lawyers paid to lie. It has a policy and history of
6 destruction of evidence (See, e.g., Ex. D). It seizes every
7 advantage our country's laws confer on religions and does not
8 perform its responsibilities as a religion. It keeps witnesses
9 with material evidence bound and intimidated by illegal "non-
10 assistance" contracts and other threats. Other people who have
11 testimony regarding Scientology's nature, structure, history,
12 "scriptures," and practices, who I know or have been so informed,
13 to also be bound by Scientology's "contracts," include, at least:
14 Laurel Sullivan, William Franks, Howard Schomer, Martin Samuels,
15 Michael Flynn, Esq., Julia Dragojevic, Esq., Garry P. McMurphy,
16 Esq., Gabe Cazares, Bent Corydon, Michael Douglas, Kima Douglas,
17 Nancy Dincalci, Edward Walters, Julie Christofferson, Nancy
18 McLean, John McLean, Warren Friske, Robert Dardano, Tonja Burden,
19 Margery Wakefield, Paulette Cooper, David Mayo. In my opinion,
20 Scientology steps so brazenly into court and sues so wantonly
21 because it believes it has so many people bound to silence that
22 it can lie with impunity.

23 70.. Mr. Ward, and indeed all of WWHELP, should be able to
24 freely obtain the testimony of anyone willing to testify on their
25 behalf, or by subpoena anyone unwilling. They should be able to
26 obtain the assistance of any expert witness they believe can
27 help. Because Scientology has so distorted the floor of the
28 legal arena I am moved to seek guidance in how to help. No
person, seeking and knowing God's guidance, would not help. I


1 have a personal interest in the outcome of all of Scientology's
2 cases, because an outcome favorable to the organization will be
3 used to attack me and my friends.

4 71. If it is within this Court's power, and I believe it
5 is, I ask that it issue an order prohibiting Scientology from
6 interfering with Mr. Ward's, Mr. Henson's and Mr. Erlich's
7 witnesses, including me, and an order to Scientology to release
8 me from its "contract" and the Thomas order so that I am free to
9 assist these defendants in their cases.

10 I declare under the penalty of perjury under the laws of the
11 State of California that the foregoing is true and correct.

12 Executed at San Anselmo, California, on January 26, 1997

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GERALD ARMSTRONG

85

Issued by the
UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF

CALIFORNIA

R.T.C. v. WARD

SUBPOENA IN A CIVIL CASE

CASE NUMBER: C 96 20207

TO: GERRY ARMSTRONG
715 SIR FRANCIS DRAKE BOULEVARD
SAN ANSELMO, CA 94960

1-23-97

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

① All documents and declarations authored by yourself documenting abuse, fraud, and unlawful acts by the Church of Scientology Enterprise or any of its investigators such as Eugene Martin Ingram. Photocopies mailed to me are acceptable.

PLACE - The office of GRADY WARD
3449 MARTHA CT., ARCATA, CA 95521

DATE AND TIME

MONDAY, JAN. 27, 1997

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Grady Ward, ATTN: PRO SE (DEFENDANT)

JAN. 17, 1997

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

GRADY WARD

grady@tidepod.com

PROOF OF SERVICE

DATE

PLACE

SERVED

MAILED JANUARY 18, 1997

FROM ARCATA, CALIFORNIA, FIRST CL.

SERVED ON (PRINT NAME)

GERRY ARMSTRONG
715 SIR FRANKS DRAKE BLVD.
SAN ANSELMO, CA 94960

MANNER OF SERVICE

U.S. MAIL

SERVED BY (PRINT NAME)

FELICITY WASSER
3449 MARTHA CT.
ARCATA, CA 95521

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

JANUARY 18, 1997

DATE

SIGNATURE OF SERVER

Felicity Wasser

ADDRESS OF SERVER

3449 MARTHA CT.

ARCATA, CA 95521

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a

person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to

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WILSON CAMPILONGO LLP

115 SANSOME STREET, SUITE 400

SAN FRANCISCO, CALIFORNIA 94104

(415) 391-3900

TELECOPY (415) 954-0938

ANDREW H. WILSON

January 24, 1997

VIA FACSIMILE (415) 456-8450 AND REGULAR MAIL

Gerald Armstrong
715 Sir Francis Drake Blvd.
San Anselmo, CA 94960-1949

Re: CSI v. Armstrong
Our File No. SCI02-003

Dear Mr. Armstrong:

I understand that you have recently been served by mail with a subpoena in RTC v. Ward pending in the Northern District of California requiring production of various documents which are within the purview of the December 6, 1986 Settlement Agreement and, hence, the various interlocutory orders and judgment in Church of Scientology International v. Armstrong, Marin County Superior Court No. 157 680. I am sure that you wish to conduct yourself so as not to violate any of your obligations under either, and I wish to avoid further conflict and annoyance between you and my client as much as possible.

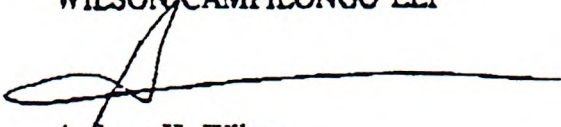
Your obligation to produce documents in response to lawfully issued and served subpoena is unquestioned. It is my understanding, however, that there are various defects with the instant subpoena, including manner of service and length of time between service and appearance. These defects, and other substantive reasons are the basis for a motion for protective order in RTC v. Ward.

I insist that you refrain from premature disclosure of documents before this motion is heard. I believe that the Agreement requires no less, and there is no reason for this to become an issue if you withhold production pending the Court's ruling in RTC v. Ward. Disclosure before this ruling would support the inference that you were in collusion with Mr. Ward, an appearance I am certain you wish to avoid.

Please let me know promptly whether you will do so. Thank you.

Very truly yours,

WILSON CAMPILONGO LLP


Andrew H. Wilson

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BOARDING PASS

NAME OF PASSENGER
ARMSTRONG/GERALD

FROM **SEATTLE**

TO **VANCOUVER**

CARRIER **CANADIAN AIR**

CARRIER **CP** FLIGHT CLASS **1192 H** DATE **11 FEB 12** TIME **12:30 P**

GATE **9A** SEAT **NO**

PCS WT UNCKD BAGGAGE ID NUMBER

1 018 1281604460 1
1V 06719963

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CALIFORNIA COURT OF APPEAL

FIRST APPELLATE DISTRICT

DIVISION FOUR

CHURCH OF SCIENTOLOGY INTERNATIONAL

Plaintiff and Respondent

v.

GERALD ARMSTRONG,

Defendant and Appellant.

Appeal No. A075027

Marin County Superior Court No. 157680

APPELLANT'S OPENING BRIEF

Gerald Armstrong
C/O George W. Abbott, Esquire
2245-B Meridian Boulevard
P.O. Box 98
Minden, Nevada 89423-0098
Defendant and Appellant
In Propria Persona
(702)782-2302

criminal charges against him with the Los Angeles District Attorney; filing false criminal charges against him with the Boston office of the FBI; filing false declarations to bring contempt of court proceedings against him on three occasions; obtaining perjured affidavits from English private investigators who had harassed him in London, England in 1984, accusing him of distributing "sealed" documents; international dissemination of Scientology publications falsely accusing him of, inter alia, crimes, including crimes against humanity; culling and disseminating information from his supposedly confidential auditing or psychotherapy file. (SS 1A, CT 8413-8; GA Declaration, 3/16/92, CT 6910-1; GA Declaration, 9/15/95, CT 5897-9; LAPD Officer Rodriguez letter re eavesdropping, 11/7/84, CT 6941; LAPD Chief Gates Announcement, 4/23/85, CT 6942; LA DA letter, 4/25/86, CT 6943-55; "Freedom," 1985, CT 7060-71; Scn Directive, 9/20/84, CT 7119,20); GA Declaration, 11/1/86, CT 6411-47. Scn calls falsehoods used to destroy reputation or public belief in a person, "black propaganda," or "black PR." (SS 1A, CT 8413; Scn policies 11/21/72 and 11/5/71, CT 7376-87) Scn also calls black PR "dead agent," and documents used for black PR purposes "dead agent documents" or "DA docs." See also Scn's Request for Judicial Notice, GA Declaration, 2/22/94, (CT 5580-93; GA Declaration, 2/20/94, CT 5624-39; SS 1A)

GA's attorney Michael Flynn was the target of Scientology's fair game from 1979 through the time of the signing of the settlement agreements. Fair game acts against Flynn included infiltrating his office, paying known criminals to testify falsely against him, suing him and his office some fifteen times, framing him with the forgery of a \$2,000,000 check, and an international black PR campaign. (SS 1B, CT 8418-20; GA Declaration, 9/9/95, CT 8245; CT 6125; GA Declaration, 1/13/94, CT 6967,8; "Juggernaut" Intelligence Eval, 9/13/81, CT 6310-6324; Jonathan Attack Declaration, 4/9/95, CT 7964; Settlement Agreement between Flynn and clients 6938,9 (signed version at CT 5483); CT 5899,900).

B. The Settlement

At the beginning of December, 1986 an agreement was reached between Flynn and Scn to settle the cases in which he was involved as counsel or party. GA was then working for Flynn in his Boston

office, was aware that settlement talks were occurring, and had an agreement with Flynn on a monetary amount to settle his cross-complaint, then set for trial in March, 1987. GA was flown to Los Angeles, as were several other clients with claims against the organization, to participate in a global settlement. Only after his arrival in LA was he shown a copy of the SA and other documents which he was expected to sign. (CT 6911,2; 6125,6; 5900,1)

Upon reading the SA, GA was shocked and heartsick. He told Flynn that the condition of strict confidentiality and silence with respect to his experiences with Scn, since they involved over seventeen years of his life, was impossible. GA told Flynn that the liquidated damages provision was outrageous; that pursuant to the settlement agreement he would have to pay \$50,000.00 if he told a doctor or psychologist about his experiences from those years, or if he put on a resume what positions he had held during his Scn years. He told Flynn that the requirements of non-amenability to service of process and non-cooperation with persons or organizations adverse to the organization were obstructive of justice. He told Flynn that agreeing to leave Scn's appeal of the Armstrong I decision and not respond to any subsequent appeals was unfair to the courts and all the people who had been helped by the decision. He told Flynn that an affidavit the organization was demanding that he sign along with the SA was false. GA told Flynn that he was being asked to betray everything and everyone he had fought for against Scn injustice. (CT 6911-2; 6126,7; 5901)

In answer to GA's objections Flynn said that the silence and liquidated damages clauses, and anything which called for obstruction of justice were "not worth the paper they're printed on." Flynn told GA this a number of times and in a number of ways; "You can't contract away your Constitutional rights; "the conditions are unenforceable." Flynn said that he had advised Scn attorneys that those conditions in the SA were not worth the paper they were printed on, but that they, nevertheless, insisted on their inclusion in the SA and would not agree to any changes. Flynn said that Scn's attorneys had promised that the affidavit, which all the settling litigants were signing, would only be used by Scn if GA began attacking it after the settlement; and if GA did not

attack Scn the affidavit "would never see the light of day." Flynn pointed out to GA the clauses concerning his release of all claims against Scn to date and its release of all claims against GA to date and said that they were the essential elements of the settlement and were what Scn was paying for. (CT 6912,3; 6127; 5901; SS 116; CT 8509)

Flynn told GA that everyone was sick of the litigation and wanted to get on with their lives. Flynn said that he was sick of the litigation, the threats to him and his family and wanted out. He said that as a part of the settlement he and all co-counsels had agreed to not become involved in organization-related litigation in the future. He expressed a deep concern that the courts in this country cannot deal with Scn and its lawyers and their contemptuous abuse of the justice system. He told GA that if he didn't sign the documents all he had to look forward to was more years of harassment and misery. Another client in the room with Flynn and GA during this discussion yelled at GA, accusing him of killing the settlement for everyone, and saying that everyone else had signed or would sign, and everyone else wanted the settlement. Flynn said that Scn would only settle with everyone together; otherwise there would be no settlement. (SS 1C, 1D, 1E, CT 8420,1; CT 6913; 6127,8; 5902) Flynn said that he had to get out of the fight, that he had done enough, that he had paid his dues, that Scientology had ruined his marriage, his wife's health and his life. (CT 5902)

Flynn told GA that a major reason for the settlement's global form was to give Scn the opportunity to change its combative attitude and behavior by removing the threat he and his clients represented to it. Flynn said that Scn's willingness to pay substantial sums of money, after its agents and attorneys had sworn for years to pay his clients "not one thin dime" was evidence of a philosophic shift within the organization. GA told Flynn that the SA evidenced the unchanged philosophy of fair game, and that if Scn did not use the opportunity to transform its antisocial nature and actions toward its members, critics and society he would, a few years hence, because of his knowledge of Scn fraud and fair game, be again embroiled in its litigation and targeted for extralegal attacks. (SS 98, CT 8487; CT 6913,4; 6128; 5902)

GA had been positioned as a deal-breaker, with all the other settling parties depending on his signing in order to have the fair game cease. He reasoned that if he signed, his co-litigants, some of whom he knew to be in financial trouble, would be happy, the stress they felt would be reduced and they could get on with their lives. Flynn and the other lawyers would be happy and the threat to them and their families would be removed. Scn would have the opportunity they said they desired to clean up their act and start anew. GA would have the opportunity to get on with his life and the financial wherewithal to do so. He was also not unhappy to at that time not have to testify in all the litigation nor to respond to the media's frequent questions. He knew that if Scn continued its fair game practices toward him he would be left to defend himself; so, armed with Flynn's advice that the SA conditions he found so offensive were not worth the paper they were printed on, and the knowledge that Scn's attorneys were also aware of that legal opinion, GA put on a happy face and the following day went through a videotaped signing, which he saw as a charade. (CT 6914,5; 6129,30; 5902)

C. From Settlement to First Response

It was GA's understanding and intention at the time of the settlement that he would honor the silence and confidentiality conditions of the SA, and that Scn had agreed to do likewise. (CT 6916) GA delivered to Scn the evidence he had accumulated in his case, released to Scn the documents held by the LASC, and agreed to the sealing of the Court file. (CT 123,4; 5925; 5940) After the settlement, GA got on with his life, did many usual or unusual things including pursuing religious studies, left Scn alone, and did not speak publicly about Scn or his experiences. (CT 6997-7000; 5902,3)

Scn, however, could not leave GA alone but continued to disseminate falsehoods about him publicly, and file false statements about him in legal proceedings. He perceived that he was still fair game, yet for 3 years, although saddened by the attacks, he did nothing in response. These fair game attacks after December, 1986, but prior to any acts by GA which Scn claims are breaches of the SA, include at least: delivering DA Documents (black PR) on him

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to various media representatives; publishing Scn's own false descriptions of his experiences; disseminating to the media an edited, misleading and defamatory version of the secret and illegal videotape its agents made of him; disseminating his own documents which had been sealed on Scn's insistence in Armstrong I; filing affidavits about him in a civil lawsuit in England (Scientology v. Miller & Penguin Books, High Court of Justice, London, England, Case No. 1987 C 6140) which falsely charged, inter alia, that GA violated court orders and was an admitted agent provocateur of the US Government; threatening him with being sued if he even talked to attorneys in the Miller case in which the false charges about him were being made; threatening to expose a private writing if he did not assist Scn's effort to prevent a civil litigant, Bent Corydon, from obtaining access to the Armstrong LASC case file; threatening him with being sued if he testified about his Scientology experiences even pursuant to a subpoena. (SS 105A-H, CT 8491-3; CT 6916-9; 5931-46; 5903,4; Excerpts DA document, CT 6007-10; videocassette face, Missing; Affidavits of Kenneth Long, CT 6011-69 (first page missing); CT 6072-102; Affidavit of Sheila Chaleff, CT 6060,1; GA 1977,8 wage and tax statement, CT 6028; GA Affidavit, CT 6029; Nondisclosure and Release Bond, CT 6030; GA Deposition Transcript, CT 6031-43; GA Affidavit, CT 6087-102; CT 5926-8; 5943,4; 6919; 5970; 5904; 6135,6; GA Declaration, CT 6219,30). In 1987 Scn also filed in one of its cases with the IRS the affidavit it had required GA sign as part of the settlement, in direct violation of the promise it made through Flynn to only use the document if GA attacked it. (CT 6138,9; IRS Final Adverse Ruling re Church of Spiritual Technology, 7/8/88, CT 6241-3; CT 5903)

In October, 1989 GA was served with a deposition subpoena by plaintiff in the case of Bent Corydon v. Scientology, LASC No. C694401. (CT 5925; Subpoena, CT 5990-4). Shortly afterward he was called by Scn attorney Lawrence Heller, with whom he had three telephone conversations over the next month. In these conversations Heller threatened that GA could be sued if he testified, even though he had been subpoenaed, and that he should refuse to answer the deposition questions put to him by Corydon's attorney. Heller offered to have Scn pay for a lawyer to represent GA at the

deposition. Heller requested GA to execute a declaration to assist Scn in preventing GA's deposition from going forward, and threatened that GA would have hassles if the deposition did go forward. Heller also stated to GA that he should honor the SA because Scn had honored it. Heller said that Scn had signed a non-disclosure agreement as well and had lived up to it. GA told Heller that Scn had filed declarations about him, put out dead agent documents on him, and used the illegal videotape. GA made notes of the conversations with Heller and recorded his side of the final conversation. (CT 5925-8; 5943,4; Phone notes, CT 6227-37; Transcript, CT 6238,9; CT 5904; 6135-7; CT 6919; CT 6970; CT 5904; SS 105H, 8493,4; SS 103, CT 8490)

On November 1, 1990 Scn filed a motion in Corydon to delay or prevent the taking of certain third party depositions, one of whom was GA. (CT 5995-6006) The motion and supporting declaration were signed by attorney Heller who stated that he was personally involved in the settlements. (Heller Declaration, CT 6002) Heller stated in the motion:

"One of the key ingredients to completing these settlements, insisted upon by all parties involved, was strict confidentiality respecting: (1) the Scientology parishioner or staff member's experiences with the Church of Scientology; (2) any knowledge possessed by the Scientology entities concerning those staff members or parishioners." (Underline in orig.) (SS 102, CT 8489,90; CT 5998)

Heller stated in his declaration:

"The non-disclosure obligations were a key part of the settlement agreements insisted upon by all parties involved." (SS 101, CT 8488,9; CT 6003)

"The contractual non-disclosure provisions were the one issue which was not debated by any of the parties or attorneys involved." (CT 6003)

As a result of Heller's telephoned threats, which deeply troubled him, GA concluded that the SA and Scn's efforts to enforce it were acting to obstruct justice, and if he allowed himself to be intimidated by the threats he would be abetting that obstruction.

He concluded that he had a right, and even a duty, regardless of whatever the SA said, to not obstruct justice. He concluded that he could not avoid a confrontation with Scn, and only then responded to defend himself and to correct what he perceived were the injustices created by the SA and Scn's misuse and violations thereof. (CT 5928; 5930; 5940; 5945; 6919; 6970; 5904) Scn was given a period of years to cease fair game. GA and the other settling litigants had honored the agreements, removed themselves as threats and allowed Scn the opportunity to change its combative attitude and behavior. GA concluded that disclosure of Scn's attitude and behavior would relieve and ultimately eliminate fair game. (CT 6141,2)

When he researched his rights, responsibilities and how to proceed in response to Scn's threats and fair game, GA learned that through the intervening five years Scientology had been able to maintain its appeal from the 1984 Armstrong I decision, Scientology v. Armstrong, No. B025920, Second District, Division Three. GA petitioned for permission to respond in the appeal. The Court granted his petition, and also unsealed the SA, which he had filed as a sealed exhibit to his petition. (SS 106, CT 8494,5; CT 6919,20; 5904; Petition, CT 6113-8) At the same time GA also petitioned Division Four of the Second District for permission to respond in another appeal, Corydon v. Scientology, No. B038975, that Scn had taken from a 1988 LASC order granting Corydon's motion to unseal the Armstrong I court file. (Petition, CT 6119-22) Scn opposed GA's petition and he filed a declaration dated March 15, 1990, (CT 5925-6123) detailing many of the organization's post settlement threats and attacks and stating his position regarding the unenforceability of several conditions of the SA. (CT 6970,1) The Division Four Court granted GA's petition, and he filed a respondent's brief in both appeals, which were ultimately consolidated.

On July 29, 1991 the Court of Appeal affirmed the 1984 decision and judgment in Armstrong I (Scientology v. Armstrong, 232 Cal.App.3d 1060, 283 Cal. Rptr. 917.) The Court of Appeal stated:

"These [Suppressive Person] "declares" subjected Armstrong to the "Fair Game Doctrine" of the Church which

permits a suppressive person to be "tricked, sued or lied to or destroyed...[or] deprived of property or injured by any means by any Scientologist." (Id. at 1067; 920) (SS 127, CT 8517,8)

In September, 1991 Scn filed a motion in the Court of Appeal to seal the record on appeal, (CT 6521-88) based in part on the assertion that "an integral, indispensable part of that [Armstrong I] settlement was the sealing of the court's records." (CT 6529) GA filed an opposition to the motion to seal (CT 6589-902) in which he stated that "[t]he superior rights regarding the materials plaintiffs want sealed are those of defendant whose safety from attack rests in part on the availability of information and the openness of court files, and those of the public who have a Constitutional right to precisely the kind of information these materials contain." (CT 6592). The Court of Appeal denied Scn's motion to seal the record. (CT 6903)

D. Fair Game After Armstrong's First Response

From the time GA petitioned the Court of Appeal, Scn has continued to fair game him without letup. These attacks include, but are not limited to: (SS 107A-L, CT 8495-503; CT 5913-4)

o Disseminating to the media dead agent packs of black PR on him which provide Scn's false version of his experiences and include at least the following lies:

- he testified falsely at trial in 1984 (Scn DA Docs re GA and Judge Breckenridge, CT 7527; 7533; 7600; 7605)

- he "has adopted a degraded life-style (CT 7528; 7600)

- he was "apparently naked" in a newspaper photo (CT 7528)

- he is connected to Cult Awareness Network, hereinafter "CAN," described by Scn as "a referral agency for those who engage in the illegal activity of kidnapping adults for the purpose of forcibly persuading them to abandon their religious beliefs" (CT 7528)

- his defense at his 1984 trial "was a sham and a fraud" (CT 7528,9; 7614)

- the LAPD "authorized" [Scn's] videotapes of GA (CT 7529; 7615)

- GA wanted to plant fabricated documents in Scientology files

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- GA wanted to plant fabricated documents in Scientology files

and tell the IRS to conduct a raid (CT 7529-31; 7609; 7615,6)

- he wanted to plunder Scientology for his own financial gain (CT 7530)

- he never intended to stick to the terms of the SA (CT 7532; 7617)

- his motives in writing attorney Eric Lieberman regarding the case of Malcolm Nothling v. Scn, in South Africa were money and power (CT 7533; GA letter, 6/21/91, CT 7482-98)

- he was incompetent as a researcher on the Hubbard biography project (CT 7533; 7622)

- he wanted to orchestrate a coup in which members of the US Government would wrest control of Scn (CT 7531; 7616)

- o Using transcripts and other documents to attack him which Scn itself has insisted be sealed (CT 7537-97; 7533; 7534; 7610; 7616; 7623)

- o Publishing black PR on him without stating its source which provide Scn's false version of his experiences and include at least these false and/or perverted charges:

- he was formerly a heavy drug user (Scn publication "FACTNet," CT 7514)

- he was paid to provide homosexual sex (CT 7514)

- a Marin Independent Journal photo showed him in the nude holding the globe (CT 7514; Marin IJ article 11/11/92, CT 7184)

- he is a psychotic and lives in a delusory world (Scn publication "FACTNet," CT 7520)

- o Scn director Michael Rinder wrote a letter to the Mirror Newspaper Group in London, United Kingdom in which he stated that GA "has now distinguished himself by posing naked in a newspaper" (Rinder letter, 5/9/94, CT 7524)

- o Scn President Heber Jentzsch wrote a letter, sent with documents about GA, to E! Television in which he stated that GA "has no relation to art or artists...except, of course, for the photo of himself, nude, hugging the globe (Jentzsch letter 8/5/93, CT 7693)

- o Scn agent Eugene Ingram spread the lie that GA has AIDS (CT 5916; 8226,7; Videotape taken by Ingram of GA at November, 1992 CAN Convention, CT 8242; Notice of Lodging Videotape, CT 8676,7))

o Scn agent Garry Scarff was briefed by Ingram to expand on the [invented] "fuck buddy" relationship between GA and attorney Ford Greene (Scarff declaration, 2/11/93, CT 7510)

o Filing declarations and other documents in various courts containing false charges, and then using the SA to prevent GA from responding or to punish him for responding (Declaration of David Miscavige, 2/8/94, filed in Scientology v. Fishman, USDC Cen. Dist. Cal. No. 91-6426 HLH, CT 7655,6; CT 5580-93; 5624-39; Scn's Second Amended Complaint herein, CT 5356,7; Scn's motion for summary adjudication of 13th, 16th, 17th & 19th causes of action, 3/17/95, CT 5312,3; Scn's separate statement in support of motion for summary adjudication, 2/23/95, CT 4524.44 CT 9789) (Scn's Supp. Memo. in Support of Motion to Dismiss, 8/26/91, filed in Aznaran v. Scientology, USDC Cen. Dist. Cal. No. 88-1786 JMI, CT 6682-6; Declaration of Sam Brown, 8/26/91, CT 6714,5; Declaration of Lynn Farny, 8/26/91, CT 6725-7; Reply in Support of Motion for Summary Judgment, 8/26/91, filed in Aznaran, CT 6797-9; GA Declaration, 9/3/91, CT 6802-12; CT 4524.36; CT; CT 9787)

o Attempting to have Armstrong jailed for contempt of court based on mischaracterization of his actions and manufactured actions (Scn's Ex Parte Application herein for OSC re Contempt, 12/31/92, CT 7121-84; GA Declaration, CT 7406,7; Scn's evidence, GA declaration, 2/2/93, CT 5016-44; Scn's Ex Parte Application for OSC re Contempt, 7/26/93, CT 1628-739; Order of Judge Diane Wayne herein discharging OSC, 7/29/94, CT 7499-501)

o Providing documentation to Premiere magazine about GA, including partial transcripts of the illegal Ingram videotaping of him and then using the settlement agreement to punish GA for responding (Article "Catch a Rising Star, 9/93, CT 7672; GA letter, 10/11/93, CT 4811-4; CT 4524.48; Scn's motion for summary adjudication of 20th cause of action, CT 4524.11; CT 9790)

o Providing a press release to the Marin Independent Journal concerning the Court's 1/27/95 ruling, which discusses GA's Scn experiences and contains the false statement that he "promised [in the SA] to refrain from spreading falsehoods about [Scn];" and then using the settlement agreement to punish GA for responding; (Scn press release from Nancy O'Meara and Andrew H. Wilson, 1/95, CT

7692; GA letter to O'Meara, CT 5056; CT 4524.17,8

o Secretly videotaping him (GA letters, 8/21/91, 8/22/91, CT 6834-9; CT 6714)

E. Armstrong's Actions

In August, 1990, GA was in a new home he had purchased in Marin County, and living his life. (CT 6998-7000) Although still a troubled target of fair game, he considered himself free of the SA's restrictions, not only because of what Flynn had told him at the time of the settlement, but because of Scn's post settlement attacks and the SA's unenforceability due to its obstruction of justice. (CT 6972; 5928; 5930; 5940; 5945) Then the Iraqi army invaded Kuwait, and his life was again forever changed. Moved by media reports of the invasion, the global tension, and the daily events of Desert Shield, GA prayed for guidance concerning humanity's condition, and specifically the then developing Middle East crisis. (CT 6988; 5905,6) GA received a message, which he believed came from God, saying: "Keep nothing. Give what you have to the poor. Take only what you need." (Message, CT 7204) The idea of renunciation of worldly wealth, although coming at that time as a surprise, and unclear as to the details for its accomplishment, was not altogether illogical to GA because he had long recognized that money, greed and power motivated much of the madness that made human beings war against each other. (CT 6988) He had already recognized the essential valuelessness of money in an essay he had written in 1989. (CT 7039-41) GA also recognized that Scn's leaders were motivated by the same forces of money, greed and power that made men war against each other and that his renunciation was spiritually directed at bringing peace for Scn no less than the rest of the world. (CT 7002) GA gave away his assets, including his ownership of The Gerald Armstrong Corporation, hereinafter "TGAC," his philosophic services company; his ownership of his home; forgave debts owed him; and determined to go wherever his help was asked for. (CT 7002; 5906) Over the next few months GA gave himself to resolving the Middle East crisis (CT 7095-103) but he was not successful and a quarter million people were killed.

In June, 1991 GA received a call from Malcolm Nothling, asking him to testify in his case against Scn in South Africa. Nothling

6

I

Church of Scientology of Texas

2200 Guadalupe, Austin, Texas 78705 (512) 474-6631

Craig Branch
Watchman Fellowship
PO Box 53084
Birmingham, AL 35253

October 21, 1996

Re: Latey and Armstrong Decisions

Dear Mr. Branch:

Enclosed are a couple of things I provided to James Walker in our last meeting. I believe this is documentation you may not have. Please keep this data in your files on Scientology.

The Latey decision a child custody decision with language that was very critical of Scientology.

Your statement during the St. Louis conference that the Church's lawyers had an opportunity to present their side of the case was not true. The judge allowed enemies of the Church to testify in this case but did not allow the Church itself to put on evidence, appear in the case or refute what was said. As you are probably well aware, custody and divorce cases where religion is made an issue are notorious for this kind of thing.

The Armstrong decision also contained language that was quite critical of Scientology. While Judge Brackenridge himself obviously had ill feelings toward the Church, the California appeals court has held that there can be no problem of stigmatization of the Church from this language because Brackenridge was only reciting Armstrong's purported state of mind. If you wished you could probably track down the appeal decision in this case and verify this for yourself.

Sincerely,



Cathy Norman

cc: James Walker

ARMSTRONG EXHIBIT A

10-May-1993

CHURCH OF SCIENTOLOGY OF CALIFORNIA (PLAINTIFF)

VS

GERALD ARMSTRONG (DEFENDANT)

June 20, 1984

FALSEHOOD IN DECISION OF JUDGE BRECKENRIDGE:

1 "While defendant has asserted various theories of defense, the basic thrust of his testimony is that he did what he did, because he believed that his life, physical and mental well being, as well as that of his wife were threatened because the organization was aware of what he knew about the life of LRH, the secret machinations and financial activities of the Church and his dedication to the truth."

TRUE INFORMATION:

2 Los Angeles Superior Court Judge Paul Breckenridge made the above statement as part of a decision where the Church had sued Armstrong for theft of certain confidential documents from the Church. As the following information will show, Gerry Armstrong, far from being afraid for his life, was actively engaged in secret machinations of his own to seize control of the Church. Far from any "dedication to the truth," Armstrong has boasted at length of his ability to lie and to forge documents.

3 Gerald Armstrong is a former clerk employed by Church of Scientology of California. During the later years of his tenure as an employee of the Church, Armstrong was placed in charge of a huge quantity of documents that belonged to L. Ron Hubbard that contained private and personal information regarding Mr. Hubbard. Part of his duties included research to support the work of an author who had been retained to write an authorized biography of Mr. Hubbard.

4 In late 1981, Armstrong suddenly vacated Church premises and left its employ, taking with him huge numbers of confidential documents that belonged to Mr. Hubbard or his wife which the Church was holding as bailee. It was no coincidence that Armstrong left at that time because he had repeatedly expressed his ambition to join the Guardian's Office, a former autonomous unit which handled external-facing matters for the Church during the 1970's. The Guardian's Office at the time Armstrong left was in the process of being taken over and ultimately disbanded by Church management due to its destructive actions in violation of the policies of the Church.

ARMSTRONG
EXHIBIT B

5 In the summer of 1982 the Church received evidence that Armstrong had stolen thousands of documents from archives when he left the Church. Church counsel wrote to Armstrong, demanding that he return them. Armstrong denied the theft.

6 Once the demand for return of documents was made, Armstrong turned the stolen documents over to an attorney named Michael Flynn, with whom Armstrong decided he could make a lot of money.

7 In August 1982, the Church sued Armstrong for conversion, breach of fiduciary duty and confidence, and invasion of privacy based on Armstrong's theft of extensive amounts of private papers owned by the Church or the Hubbards. The Church sought return of the papers and the imposition of a constructive trust over them, and any proceeds derived from them, as well as preliminary and permanent injunctive relief against dissemination or disclosure of the private documents.

8 In September 1982, Armstrong, represented by Flynn, answered the complaint and raised the defense that he was justified in stealing the documents entrusted to him as a fiduciary because he wished to make public information about Mr. Hubbard and the Church out of fear for his safety and well-being. His defense was stricken on four different occasions by three different judges.

9 Armstrong and Flynn were then ordered to turn all copies of the documents that Armstrong had stolen over to the court where they were placed under seal. By the time this was done, however, they had ample time with the documents to prepare a defense that was largely based on the documents.

10 In April 1984, the case was assigned for trial before Judge Paul Breckenridge, Jr. At that time the Church presented motions to prevent Armstrong from introducing the stolen, confidential documents since their introduction into evidence would invalidate the very rights of privacy the action sought to protect. The Court not only allowed Armstrong to introduce the confidential documents, but also allowed him to raise his four-times stricken defense with a new perverted twist. He would not have to prove there was anything to fear from the Church, but only that it was his state of mind that there was at the time that he stole the documents. The Church was completely ambushed in the trial by these documents, as in most cases Armstrong had stolen the only copy that existed. Whereas Flynn had been able to prepare their case from documents before they were placed under seal in the Court, the Church had no access to them. Although the inflammatory allegations that Armstrong made and purported to support with these documents could have been shown to be false or grossly distorted by other evidence, the Church had no chance to prepare and put on that evidence before being hit with the documents in trial.

11 During the trial, Armstrong presented testimony from numerous witnesses who testified for the purpose of establishing Armstrong's supposed "state of mind" with regard to his alleged justification for stealing the documents. Each of the witnesses was hostile to the Church and, in fact, was a plaintiff against or taking a position adverse to the Church in other litigation in which Flynn was the counsel. Each witness gave general testimony about his or her own viewpoint on relationships with the Church in an effort to bolster Armstrong's state of mind justification defense.

12 The Court did not allow the Church to put on evidence to rebut the testimony of those witnesses. The Court also declined to allow the Church to put on evidence explaining the confidential documents and precluded the Church's proffered rebuttal evidence on the ground that the adverse testimony was admitted only for the purpose of establishing Armstrong's state of mind and not for the truth or falsity of the matter testified about.

13 On July 20, 1984, Judge Breckenridge issued the above Statement of Intended Decision which became final a month later, which held that the Church had "made out a prima facie case of conversion..., breach of fiduciary duty, and breach of confidence" (i.e. the Church had proven that Armstrong was guilty of stealing the documents and violating the confidences and duties he owed to his former employer). Judgment, however, was entered in favor of Armstrong, essentially finding that Armstrong was justified in committing these offenses to defend himself because he had become "... terrified and feared that his life and the life of his wife were in danger, and he also feared he would be the target of costly and harassing lawsuits." The judge went on to pontificate on the psychological mind-set of not only Mr. Hubbard, but Scientology at large. The only lawsuit that there was to fear was the one that was ultimately filed for return of the stolen documents. It never would have been brought had Armstrong voluntarily returned the documents when asked, despite the theft.

14 Thus the entire basis for the Breckenridge decision was that Armstrong's state of mind when he committed these thefts was that he was afraid of the Church. Evidence found after the Armstrong trial proves not only that Armstrong never was afraid of the Church as he claimed at trial -- those claims were a total farce -- but that he was engineering a plan to infiltrate and take over the Church at the behest of the Criminal Investigation Division of the Internal Revenue Service (IRS CID), in complete and willful violation of the First Amendment to the Constitution and the actual purpose of the IRS.

15 Shortly after the trial, Armstrong's conspiracy against the Church surfaced when he sought, at the behest of IRS CID agents Al Lipkin and Phillip Xanthos, to recruit Church employees and

organize them against the Church. To this end Armstrong contacted a Church member and former friend to enlist his aid in recruiting a group of dissident Scientologists to overthrow Church management. After this individual informed the Church of Armstrong's plan, however, the Church obtained permission from the Los Angeles Police Department to conduct undercover surveillance of Armstrong in order to catch him in the act. The Church then used two "undercover" persons to collect evidence of Armstrong's machinations.

16

Videotaped conversations show that Armstrong intended to recruit additional persons to create "as much s___ for the organization as possible." Part of this plan was to seed the Church's files with forged and "incriminating" documents which would then be seized in a raid by the Internal Revenue Service. Armstrong and those he recruited would then follow after with sham lawsuits intended to seize control of the Church after such a raid. The video-taped conversations also showed Armstrong planning in advance to lie under oath to prevent discovery and to protect his co-conspirators.

17

Armstrong was also captured on the videotapes admitting that there the purported basis for his justification defense -- that he feared the Church -- was completely bogus, since he had no fear that anyone associated with the Church could or would harm him. Speaking with an undercover operative known to Armstrong as "Joey," Armstrong revealed his "justification" defense for the fraud it was, and that his only "fear" was that his conspiratorial plans would be discovered:

JOEY: Well, you're not hiding!

ARMSTRONG: Huh?

JOEY: You're not hiding.

ARMSTRONG: F___ no! And . . .

JOEY: You're not afraid, are you?

ARMSTRONG: No! And that's why I'm in a f___ing stronger position than they are!

JOEY: How's that?

ARMSTRONG: Why, I'll bring them to their knees!

18

Armstrong requested that the undercover persons give him Church documents so that he could forge documents in the same style. In particularly revealing language with respect to the documents he stole and later relied on at trial, Armstrong stated with respect to forgeries that he could "create documents with relative ease" because he "did it for a living."

19

Armstrong then planned to "plant" forged, incriminating documents in the Church's files so that those documents could be later discovered and used to discredit the Church. Armstrong planned to "tip off" investigators for the Criminal Investigations Division of the Internal Revenue Service once the phony documents were safely planted so that they could be "discovered" in a later IRS raid.

JOEY: (Laughs) Great, so what kind of stuff are we going to want to create and who's going to get it?

ARMSTRONG: That's what we need to talk about!

* * *

JOEY: -- and what do the agencies want on this?

ARMSTRONG: O.K. Well, the agencies have asked for some specific things, that's all they asked for. Now - -

* * *

JOEY: Now, who wanted this?

ARMSTRONG: CID.

20

The videotapes also reveal Armstrong's true motivations and his systematic and fraudulent sabotage of the trial. Armstrong stated he would bring the Church to its knees and that the fomentation of litigation was one of the prime vehicles for accomplishing this objective. He stated:

ARMSTRONG: That they're going to lose in a whole bunch of jurisdictions. They're going to lose, they're going to lose, they're going to lose (tapping his palm each time he said it). And they're going to start losing (shrugs) 1985. They only even have to lose one, and attorneys all over the country are going to jump on the f___ing bandwagon. And watch, you know, all of a sudden you've got precedents being established, which are incredible.

21

Armstrong further explained that, from his perspective, neither the truth nor good faith play any significant role in litigation. He instructed the undercover Church member that facts mean nothing to a civil litigant and that truth is merely an avoidable obstacle. Armstrong explained how a civil claim can be pursued despite an absence of a claim or essential facts:

ARMSTRONG: They can allege it. They can allege it. They don't even have -- they can allege it.

MIKE: So they don't even have to have the document sitting in front of them and then --

ARMSTRONG: F___ing say the organization destroys the documents

* * *

ARMSTRONG: Where are the -- we don't have to prove a goddam thing. We don't have to prove s___; we just have to allege it.

22

As to Armstrong's "dedication to the truth," for which he is complimented in the trial court's decision, Armstrong took the opportunity to instruct both "Joey" and "Mike" separately on the need and desirability of lying under oath:

ARMSTRONG: By the way, no one will ever get any names, any communications, any times, any dates or anything out of me, that's just the way it is. I'll go to prison before I ever talk, okay. So you have to know that, because they're wanting to depose me every couple of months. I'm simply saying no, anyone I talked to that's, that has nothing whatsoever to do with this lawsuit, the causes of action in my lawsuit began in 1969 when I was enticed into the Sea Organization and it ended in 1981, or they actually they continue on because you guys have continued to harass me but you...

MIKE: Not us, hey!

ARMSTRONG: No, I'm telling you what I would tell them in deposition, but they don't get anything else, go ahead.

MIKE: Okay, so that, that's fine, we have an agreement on that point.

ARMSTRONG: Right. And you guys also have to have your agreements marked out between yourselves too, like, I don't know who knows I'm involved but, I'll deny it!

MIKE: Okay, well, we haven't said anything either.

ARMSTRONG: Good, Good.

23

Armstrong was even more direct in discussing the fine points of perjury when speaking with Joey:

ARMSTRONG: OK. What are our conversations, should it come down to it?

JOEY: What do you mean?

ARMSTRONG: What do we talk about. You're deposed. You walk out there, and there's a PI hands you paper, saying you're deposed Jack, and not only that, you're out of the organization. And what do you say in deposition. Well, Armstrong and I talked about this, and he had a whole bunch of ideas about how to infiltrate the communication lines and spread turmoil and disaster, you know! What are we doing here? That's my question, before I tell you my ideas on documents.

* * * *

ARMSTRONG: OK. So as far as the doc...Let me just say ab, you and I get together, we get together because I have a goal of global settlement. You have felt that the turmoil and abuses and so on have gone on too long... Hence we get together and discuss things. We have not discussed anything about a destruction of the tech, or Scientology is bad, or anything like that. Are we agreed?

JOEY: Yeah.

24

The evidence shows Armstrong's state of mind, not to be fear, but instead to be of a calculating, aggressive and dishonest character.

25

The Armstrong case was reviewed by the California Court of Appeal in summer 1991. The Court of Appeal refused to accept the evidence that the Church had discovered after the trial as outlined above, on the technicality that the trial court never got to see it first (an impossibility since it was obtained after the trial). The Court of Appeal upheld Breckenridge's decision on the legal technicality that it believed a

justification defense is available to defend against theft in California. As to the Church's protest to the gratuitous and condemning language of the Armstrong decision, the Court of Appeal ruled there was not a problem of stigmatization because Breckenridge was only reciting Armstrong's purported state of mind.

26

In December 1986, Armstrong entered into a settlement agreement with the Church. The agreement was designed to resolve all present and future issues between the parties. Armstrong agreed not to insert himself into future legal proceedings regarding the Church absent legal process. Within a short time after receiving the Church's money, however, Armstrong embarked on a course of conduct in direct, intentional violation of that agreement.

27

Upon entering into the agreement, Armstrong acknowledged that he understood the provisions of the settlement and had received legal advice thereon. Armstrong now states, however, that he found these provisions to be "not worth the paper they were printed on." He now says that he "put on a happy face" and "went through the charade" of signing the settlement agreement. The Church recently sued Armstrong for his blatant disregard of his obligations under the settlement agreement. After a full hearing, in which Armstrong was able to fully air his "justification defense", essentially replaying his 1984 case, another Superior Court Judge was not impressed and slapped Armstrong with a preliminary injunction.

Q/

5

GEORGE W. ABBOTT, CHARTERED
Law Offices

February 12th and 14th, 1997

Ms. Cathy Norman
Church of Scientology of Texas
2200 Guadalupe
Austin, TX 78705

By Fax at 512/474-2986
Hard copy to follow:
Certified mail RRR

Re: Norman/Branch letter dated October 21, 1996 and
a dead agent document ("da doc") of May 10, 1993.

Dear Ms. Norman:

This letter is written on behalf of my friend and neighbor, Gerald Armstrong. The professional advice given to him by me, as reflected hereinafter, represents my best judgments and resulting conclusions on the facts made known and perceived by me.

The judgments and conclusions reached were formed after reasonable inquiry that the allegations made are grounded in fact and warranted by existing law or a good faith argument for the extension, modification, or reversal of law existing in one or more jurisdictions.

On the same bases, and further consistency with Fed. R. Civ. P. Rule 11 please be advised that, to the best of my knowledge, information and belief the actions, demanded of you and your associates are imposed for entirely proper purposes.

You have caused to be transmitted to Craig Branch of the Watchman Fellowship a letter dated October 21, 1996 and a "dead agent document" (herein, sometimes "da doc") dated 10-May-1993, both of which concern Gerald Armstrong and recently received by him. Your letter states that you earlier provided that same da doc to James Walker, also of the Watchman Fellowship.

I am copying the Church of Scientology International, the Religious Technology Center and Scientology's leader David Miscavige because the da doc originated with them. These materials individually and together defame Mr. Armstrong. They contain distortions and lies known to you and your seniors to be distortions and lies, and were created and distributed with malice. Separately and collectively, they constitute libel per se.

Ms. Cathy Norman
February 14, 1997

Page Two

I represent Mr. Armstrong in his effort to correct the wrong done by you, your associates, and your seniors with and through your letter and the subject "dead agent document."

As you and your seniors know, Mr. Armstrong is an expert in the subject of fair game and in the fraudulent representations and history of Scientology. As you know, his testimony has been used in many lawsuits involving people who had been defrauded or "fair gamed" by your organization. Your letter and the da doc are intended to have the effect of destroying Mr. Armstrong's credibility and character and his ability to testify on behalf of fraud and fair game victims.

Another intended effect of these defamatory materials outside of the legal arena is to cause Mr. Armstrong to be rejected by people. As you know, Watchman Fellowship is a Christian research and apologetics organization, and Mr. Armstrong is a fellow believer. Your da doc was also used within the Scientology organization to cause Mr. Armstrong to be wrongly reviled and attacked by Scientologists.

Mr. Armstrong is distressed by this latest incident in your organization's black propaganda campaign. He believes that as long as Scientology continues to fabricate and tell lies about him he is in danger. He wants all of Scientology's fair game activities to end so that he can obtain the peace he and others are due.

The subject da doc was not included in the set of dead agent packs on Mr. Armstrong produced by Scientology in discovery in its litigations against him. For this reason I am copying Mr. Armstrong's former attorney Ford Greene so that he may take whatever action, if any, he may deem appropriate concerning Scientology's withholding of this document.

Demand is hereby made that every document of any kind under the control of any individual staff member or agent of any Scientology corporation or other entity, including all electronic records, pertaining in any way to Mr. Armstrong, be segregated, made safe and not destroyed or altered, nor removed from their present premises.

I have advised Mr. Armstrong that he is free to communicate orally, in writing or by any other legal medium available to him to

Ms. Cathy Norman
February 14, 1997

Page Three

fully correct the lies and distortions in your letter and dead agent document. I have advised him that he is free to communicate to anyone he believes may have been or may be exposed to this black PR, and that he is free to explain why Scientology and its leaders have created and distributed these documents.

I have further advised Mr. Armstrong that Scientology cannot legally prevent him from correcting this libel with threatened enforcement of your organization's "settlement agreement" of December, 1986. Each moment you and your seniors prevent him from telling the truth to whomever he chooses in rejection of your documents' attack on his character you are increasing his damages.

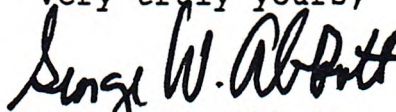
I demand, on his behalf, that you and your seniors immediately publish a full retraction of each and every lie and distortion in these documents. I further demand that you and your seniors immediately provide me with a complete list of each and every person, agency, organization or other entity inside or outside of Scientology to whom this da document was at any time given or shown. Since this document was apparently created in 1993, it was not created for the purpose of sending to Mr. Branch and Mr. Walker in 1996, but for a far wider distribution.

Finally this is a demand for \$900,003.00 to compensate Mr. Armstrong for the damage you and your organization have done — up to the date of this demand — by the writing and dissemination of your letter and this da doc to the Watchman Fellowship.

If an understanding cannot be reached, and correction of this situation cannot be achieved, Mr. Armstrong is prepared to file a lawsuit for, inter alia, defamation, intentional infliction of emotional distress, and civil rights violations against you and all other persons, organizations or entities who participated in the writing and dissemination. He is prepared, also, to file a parallel and complementary action pursuant to the provisions of the Racketeering and Corrupt Influences Act.

I trust that you and your seniors will do the right thing.

Very truly yours,


George W. Abbott

cc: Page following

Ms. Cathy Norman
February 14, 1997

Page Four

cc: Ford Greene, Esquire
cc: Church of Scientology International
cc: Religious Technology Center
cc: David Miscavige

Ford Greene, Esquire
711 Sir Francis Drake Boulevard
San Anselmo, CA 94960

Church of Scientology International
6331 Hollywood Boulevard, Ste. 1200
Los Angeles, CA 90028

Religious Technology Center
1710 Ivar Avenue, Ste. 1100
Los Angeles, CA 90028

David Miscavige
1710 Ivar Avenue, Ste. 1100
Los Angeles, CA 90028

11

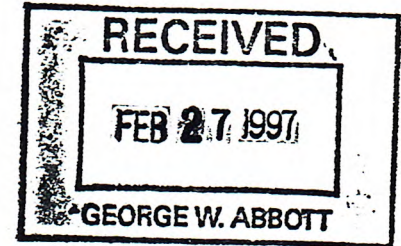
K

ANDREW H. WILSON

WILSON CAMPILONGO LLP
115 SANSOME STREET, SUITE 400
SAN FRANCISCO, CALIFORNIA 94104
(415) 391-3900
TELECOPY (415) 954-0938

February 25, 1997

George Abbott, Esq.
2245-B Meridian Blvd.
P.O. Box 98
Minden, Nevada 89423-0098



Re: Church of Scientology v. Armstrong
Our File No. SCI02-003

Dear Mr. Abbott:

This firm represents the Church of Scientology International ("CSI") in the referenced matter and has been asked to respond to your letter dated, curiously, "February 12th and 14th, 1997."

Although you say that you conducted a "reasonable inquiry" that the allegations you made are grounded in fact, it is quite apparent that you are ignorant of the lengthy history of the dispute between my client and Mr. Armstrong. Although you allude to it, you are unaware or have ignored the import and effect of the settlement agreement (the "Agreement") which they entered into on December 8, 1986. As you should know from your reasonable investigation, Mr. Armstrong raised every conceivable challenge to the Agreement in the referenced action, including the argument that the Agreement could not prohibit him from responding to allegations made by CSI concerning him.

All of Mr. Armstrong's arguments were rejected each time he made them. Armstrong was first enjoined from violations of the Agreement by the Hon. Michael Dufficy in March of 1992 by way of a temporary restraining order. The Hon. Ronald Sohigian in May, 1992, entered a preliminary injunction to similar effect. Judge Sohigian's order was appealed by Armstrong and affirmed in an opinion which dismissed Armstrong's arguments out of hand. In January of 1996, a Judgement of Permanent Injunction (the "Injunction") was entered against Armstrong in Marin County Superior Court following an order entered by the Hon. Gary Thomas summarily adjudicating various causes of action, including one for injunctive relief. It would behoove you to review these orders, and the papers in support and in opposition to the motions which resulted in those orders before advising Mr. Armstrong that "...he is free to communicate orally, in writing or by any other legal means available to him to fully correct..." alleged lies and distortions. The fact is that Mr. Armstrong is not free to do that. Mr. Armstrong's sole remedy is to seek appropriate relief for alleged defamatory statements.

The problem, of course, with that approach is that Mr. Armstrong will never be able to prove defamation. I have reviewed the documents which you allege are defamatory and am unable to find any statement concerning Mr. Armstrong, much less one which is defamatory. Please enlighten me

as to which statements you contend are defamatory, and why you make that contention. Please also inform me exactly how Mr. Armstrong became aware of the alleged defamatory communication and what persons Mr. Armstrong believes he needs to communicate with in order to correct these alleged defamatory statements.

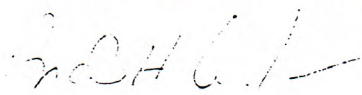
Your letter refers to Mr. Armstrong as your "friend and neighbor." It is my understanding that Mr. Armstrong currently resides in San Anselmo, California. In fact, I gave Mr. Armstrong notice on Friday, February 14 by telephone to his residence in San Anselmo (Telephone No. 456-8450) of an ex parte application for the issuance of an order to show cause re contempt. The telephone was answered by an answering machine which played a recording of the voice of Lorien Phippany which stated "Please leave a message for either Jerry or Lorien." As I was drafting this letter, I again called that number and heard exactly the same message. If Mr. Armstrong is currently residing in Minden, Nevada or its environs, I would appreciate your letting me know.

For your information, the ex parte application was successful. I enclose the application, supporting papers, and the order to show cause which Judge Thomas issued. You should find it interesting reading. I believe that my client has shown remarkable restraint in its dealing with Mr. Armstrong in enforcing the Judgment. It is apparent that Mr. Armstrong has a pathological inability to remain disconnected from CSI. This inability manifests itself in various provocations, such as the letter to the Los Angeles City Council which you must have discovered in the course of your reasonable investigation. CSI has "turned the other cheek" when it could, given the pathetically ineffectual nature of most of these provocations. However, it could not sit idly by in the face of Mr. Armstrong's direct communication with a sitting United States District Judge.

It is apparent to me that you and Mr. Armstrong are colluding to create a defense to a charge of contempt against Mr. Armstrong, as evidenced by your statement that you have advised Mr. Armstrong that he is free to communicate with anyone to correct lies which have been told about him. Before you provide Mr. Armstrong with such a purported "advice of counsel" defense, you should carefully consider whether you have a reasonable basis for such advice, whether you are subjecting yourself to liability for your uninformed advice or, even worse, for your collusion with Armstrong to avoid the Court's directive, and whether you are ultimately willing to be yet another victim of Mr. Armstrong's pathology.

Very truly yours,

WILSON CAMPILONGO LLP



Andrew H. Wilson

AHW-1917.ltr
Enclosures

12

7

Excerpts from Church of Scientology IRS 1023 Tax Exempt Application

pages taken from the Church of Scientology's Form 1023 Application to the Internal Revenue Service for tax-exempt status, in connection with the settlement of its ongoing litigation with the IRS in 1993.

Much of this information has been covered before or is covered in more detail in the responses to specific subparts of Question 10 that follow. Consider the following:

* The decision in "**Gerry Armstrong as a CID operative**"

Gerry Armstrong's case is one of those described in detail in response to Question 10.e.ii. **Armstrong's** fanatical hatred of Scientology ingratiated him with the LA CID and earned him the status of IRS operative in an unlawful scheme to infiltrate and destroy the Church through, among other things, the seeding of Church files with forged or manufactured documents. **Armstrong** was a link between the CID and Michael Flynn, whose multi-jurisdictional litigation campaign against Scientology was encouraged and assisted by the CID. (See pages 10-8 to

10-16 of our response to Question 10 of your second series of questions). The allegations, first manufactured by **Armstrong** and **Flynn**, have been adopted and parroted by many of the other tort litigants whose cases are described in the response to Question 10.e(i). In exchange, **Gerry Armstrong** has been insulated from liability for his theft of Church documents and encouraged to continue and to expand his nefarious efforts.

.....

Church of Scientology v. Gerald Armstrong:

We have included some background information here and an epilogue to the decision in question. That is because the Service has continuously thrust the **Armstrong** case at us, demanding an explanation. The **Armstrong** case decision was so inflammatory and intemperate that it was used to stigmatize the Church in the legal arena and make other outrageous decisions possible. As we shall demonstrate below, all this decision ever involved was **Armstrong's** state of mind, which subsequently obtained evidence proved conclusively to be one sordid, sado-masochistic nightmare. Furthermore, **Armstrong's** state of mind horror stories have fallen on deaf ears in recent litigation. Relying on **Armstrong** or the **Armstrong** decision is wholly unjustified.

During the later years of his tenure as an employee of the

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Church, **Gerald Armstrong** was placed in charge of a huge quantity of documents that belonged to Mr. Hubbard that contained private and personal information regarding Mr. Hubbard. Part of his duties included research to support the work of an author who had been retained to write an authorized biography of Mr. Hubbard.

In late 1981 after the initial clean out of the higher levels of the Guardian's Office, and when investigations were turning toward identifying those in alliance or sympathy with the GO, **Armstrong** suddenly vacated Church premises and left its employ, taking with him huge numbers of confidential documents that belonged to Mr. Hubbard or his wife which the Church was holding as bailee. It was no coincidence that **Armstrong** left at that time because he had repeatedly expressed his ambition to join the GO and work in Bureau 1 (Information Bureau), the same area of GO that had been responsible for the criminal acts of the 70's. **Armstrong** also had been a long-time friend and confidant of Laurel Sullivan. Just prior to the take over the GO taking place, Sullivan had made a proposal to place convicted GO members into corporate positions of control throughout the top of the ecclesiastical hierarchy. She was also found to be spying on the CMO for the GO during the early days of the CMO's investigation into the GO. **Armstrong** assisted and supported Sullivan in her efforts.

In the summer of 1982 the Church received evidence that **Armstrong** had stolen thousands of documents from archives when he left the Church. Church counsel wrote to Armstrong, demanding that he return them. **Armstrong** denied the theft. Once the demand for return of documents was made, **Armstrong** turned the stolen documents over to **Michael Flynn**, with whom Armstrong decided he could make a lot of money.

In August 1982, the Church sued **Armstrong** for conversion, breach of fiduciary duty and confidence, and invasion of privacy based on **Armstrong's** theft of extensive amounts of private papers owned by the Church or the Hubbards. The Church sought return of the papers and the imposition of a constructive trust over them, and any proceeds derived from them, as well as preliminary and permanent injunctive relief against dissemination or disclosure of the private documents.

In September 1982, **Armstrong**, represented by **Flynn**, answered the complaint and raised the defense that he was justified in stealing the documents entrusted to him as a fiduciary because he wished to make public information about Mr. Hubbard and the Church out of fear for his safety and well-being. His defense was stricken on four different occasions by three different judges.

In April 1984, the case was assigned for trial before Judge Paul Breckenridge, Jr. At that time, the Church presented motions in limine to prevent **Armstrong** from introducing the stolen,

confidential documents since their introduction into evidence would vitiate the very rights of privacy the action sought to protect. The Court not only allowed **Armstrong** to introduce the confidential documents, but also allowed him to raise his four-times stricken defense with a new perverted twist. He would not have to prove there was anything to fear from the Church, but only his state of mind when he stole the documents. The Church was completely ambushed in the trial by these documents, as in most cases **Armstrong** had stolen the only copy that existed. Then, after he and **Flynn** had ample time to prepare their case from them, the documents were placed under seal in the Court. Although the inflammatory allegations that **Armstrong** made and purported to support with these documents could have been shown to be false or grossly distorted by other evidence, the Church had no chance to prepare and put on that evidence before being hit with the documents in court.

During the trial, **Armstrong** presented testimony from numerous witnesses who testified for the purpose of establishing **Armstrong's** supposed "state of mind" with regard to his alleged justification for stealing the documents. Each of the witnesses was hostile to the Church and, in fact, was a plaintiff against or taking a position adverse to the Church in other litigation in which **Flynn** was the counsel. Each witness gave general testimony about his or her own viewpoint on relationships with the Church in an effort to bolster **Armstrong's** state of mind justification defense.

The Court did not allow the Church to put on evidence to rebut the testimony of those witnesses. The Court also declined to allow the Church to put on evidence explaining the confidential documents and precluded the Church's proffered rebuttal evidence on the ground that the adverse testimony was admitted only for the purpose of establishing **Armstrong's** state of mind and not for the truth or falsity of the matter testified about.

On July 20, 1984, Judge Breckenridge issued a Statement of Intended Decision which became final a month later, which held that the Church had "made out a prima facie case of conversion.... breach of fiduciary duty, and breach of confidence" (as the former employer who provided confidential materials to its then employee for certain specific purposes, which the employee later used for other purposes to employer's detriment). Judgment, however, was entered in favor of **Armstrong**. The Statement of Decision adopted as the facts of the case the allegations which **Armstrong** had made in his trial brief. These allegations included the statements on which **Armstrong** premised his justification defense; i.e., that defendant "... became terrified and feared that his life and the life of his wife were in danger, and he also feared he would be the target of costly and harassing lawsuits." The judge went on to pontificate on the psychological mind-set of not only Mr. Hubbard, but Scientology

at large. The only lawsuit that there was to fear was the one that was ultimately filed for return of the stolen documents. It never would have been brought had **Armstrong** voluntarily returned the documents when asked, despite the theft.

The IRS CID, however, absorbed Breckenridge's findings as the definitive statement of what Scientology is, and used this decision and the Flynn witnesses who testified at the trial as the nucleus of their investigation. The Church tried repeatedly to explain to the IRS that the **Armstrong** decision was nothing more than a statement concerning Armstrong's state of mind. The CID and EO weren't interested, as they found in **Armstrong** a kindred spirit who echoed their own sentiments.

They therefore embraced **Armstrong** and the **Flynn** witnesses and used their fabrications as the basis for their investigations and denials of exemption.

Evidence found after the **Armstrong** trial proves not only that **Armstrong** never was afraid of the Church as he claimed at trial,

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Berlin, den 26. Oktober 1997

ZUR HEUTIGEN VERANSTALTUNG IM "HAUS DER KIRCHE"

Gerry Armstrong: Auf der Flucht vor dem Recht

"Sie haben in der ganzen Welt nach dem führenden Sprecher gegen Scientology gesucht und alles, was sie gefunden haben, ist ein Flüchtling vor der amerikanischen Justiz, den seine Flucht nach Kanada geführt hat. Seine normalen Aktivitäten bestehen aus Gesprächen mit den Toten.", so der Anwalt Scientology Kirche International, Elliot Abelson. "Eine solch psychotische Person wie Gerry Armstrong als einen glaubhaften Zeugen vorzuführen, ist ein neues Tief in der versagenden internationalen Kampagne gegen grundlegende Rechte von Mitgliedern der Scientology Kirche, die durch staatlich beauftragte Personen betrieben wird."

"Eine 72-stündige kindische Boykottkampagne wurde gegen den Marsch für Religionsfreiheit lanciert. Der morgige Marsch wird von der interreligiösen Organisation FRG - Freedom of Religions in Germany organisiert, um das Recht der Freien Rede von Scientologen einzuschränken. Das beinhaltet unter anderem so pubertäre Aktionen wie das Stornieren von Hotelreservierungen und Transportvereinbarungen, sowie Equipment-Bestellungen und sogar die falsche Ankündigung, daß der Marsch abgesagt worden sei."

"Manche Leute, wie z.B. einige "Experten" der Regierung haben die Fähigkeit als rationale Wesen zu handeln völlig verloren."

"Nichts in der jüngsten Vergangenheit ist mit den oben beschriebenen Kindergarten-Taktiken zu vergleichen. Deutschland ist nicht nur im Mittelpunkt schroffer internationaler Politik, sondern wird zusehends zur Komödie der zivilisierten Welt." sagte Herr Abelson.

Herr Armstrong, der hier angeführte "Scientology-Experte" wurde wegen "Mißachtung des Gerichts" für schuldig befunden. Als er zum Gefängnis befohlen wurde, floh er aus den U.S.A. und versteckt sich zur Zeit in Kanada. Vor Gericht hat er verkündet, daß er gewöhnlich mit Verstorbenen spricht.

"Daß er der einzige Anti-Scientology Sprecher ist, der von Ursula Caberta und Renate Rennebach gefunden werden konnte, zeigt, wie verzweifelt hier versucht wird, jemanden außerhalb Deutschlands zu finden, der sie in ihrer unverfrorenen Bigotterie unterstützt."

V.i.S.d.P Ute Koch, Scientology Kirche Berlin

Berlin, October 26, 1997

TO TODAY'S MEETING AT THE "CHURCH HOUSE"

Gerry Armstrong: Fugitive from the Law

"They searched the whole world for the leading speaker against Scientology and all they found is a fugitive from American Justice, who fled to Canada. His normal activities consist of conversations with the dead" said lawyer Elliot Aberson who represents the International Church of Scientology. "To present such a psychotic person as Gerry Armstrong as a reliable witness is a new low in the losing international campaign, which is organized by people with governmental backing, against the fundamental rights of the members of the Church of Scientology."

"A 72 hour childish boycott campaign was called against the March for Freedom of Religion. This is to curtail free speech of the members of the Church of Scientology in tomorrow's march, which has been organized by the interreligious organization FRG - Freedom of Religion in Germany. This consists of adolescent actions, like cancelling hotel reservations, transportation arrangements and equipment orders, and the false announcement that the March for Religious Freedom was cancelled."

"Some people, like some Government "experts," have completely lost the ability to act rationally."

"Nothing in the recent past is comparable with the above described kindergarten tactics. Germany is not only at the center of harsh international politics, but it is becoming more and more the laughing stock of the civilized world," said Mr. Abelson.

Mr. Armstrong, the so-called "Scientology Expert," was found guilty of contempt of court. When he was ordered to report to jail he fled the USA and is hiding in Canada. He stated in court that he normally converses with the dead.

"That he was the only anti-Scientology speaker found by Ursula Caberta and Renate Rennebach, shows how desperate they are to find someone outside of Germany to support their base bigotry.

V.i.S.d.P. Ute Kock, Church of Scientology Berlin

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GERALD ARMSTRONG,

CV-N-97-00670-HDM (RAM)

Plaintiff,

vs.

COMPLAINT FOR LIBEL
AND DEFAMATION, AND
FOR OTHER RELIEF

DAVID MISCAVIGE and CATHY
NORMAN, individuals; CHURCH
OF SCIENTOLOGY INTERNATIONAL,
a California corporation; the
RELIGIOUS TECHNOLOGY CENTER,
a California corporation; the
SEA ORGANIZATION, a California
based unincorporated entity;
and the CHURCH OF SCIENTOLOGY
OF TEXAS, a Texas corporation;

JURY DEMAND

Defendants.

CV
DEPUTY

LANCER, WILSON
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FILED

Plaintiff, Gerald Armstrong, alleges as follows:

JURISDICTION AND VENUE

1. Subject matter jurisdiction resides in this Court pursuant to 28 U.S.C.A. § 1332, as plaintiff is a resident of Nevada, and defendants are residents of California or of Texas.

2. The amount in controversy exceeds Seventy-five Thousand Dollars (\$75,000), exclusive of interest and costs.

3. Venue is laid in this United States District Court (Northern Division) for the District of Nevada pursuant to 28 USCA § 1391 (a) and pursuant to Local Rule 1002 (b) (1-2).

NATURE OF THE ACTION

4. Plaintiff, as claims for relief, alleges entitlement to damages caused by defendants' malicious publication and dissemination of false and defamatory statements, as well as claiming damages for defendants' intentional infliction of emotional distress upon him.

PARTIES

5. Plaintiff Gerald Armstrong ("GA", "Armstrong") a resident of Nevada at the time of filing this complaint, from 1969 through 1981 was a devoted and trusted Scientologist. From 1971 through 1981 he was a member of the Sea Organization, the highly dedicated upper echelon and management arm of Scientology. For significant portions of that period he dealt directly with Scientology founder L. Ron Hubbard and became intimately familiar with organization policies and practices. Armstrong's last assignment was to maintain and make available to Hubbard's biographer the most personal and revealing Hubbard boyhood-forward lifetime documents. It was in this period that Armstrong discovered the dark side of Scientology's founder, ultimately leading Armstrong to leave the organization.

6. Defendant Church of Scientology International ("CSI") and defendant Religious Technology Center ("RTC") both California corporations, as recently as October 29, 1997 have been found by the California Superior Court of Los Angeles County to be two of

the alter ego firm control entities of the full Scientology operations.

7. Defendant Sea Organization ("Sea Org"), an unincorporated California-based entity or association housed in the various business offices of that state's corporate party defendants herein, is the third of the alter ego entities which control Scientology throughout the world.

8. Defendant David Miscavige ("DM", "Miscavige") is the individual who is the present RTC chairman and the highest ranking member of the Sea Org. The Sea Org, on information and belief and upon proofs to be adduced in these proceedings, is "the absolute power center" of the whole "Scientology" establishment said to be located worldwide, including 150 satellite or affiliated entities claimed to exist in the United States. Miscavige sits alone and highest at the very center of "the absolute power center," controlling absolutely by whatever traditional Scientology/Hubbard/Miscavige means are required.

9. Defendant Church of Scientology of Texas ("CST") is a Texas corporation, under the domination and control of, the California defendants herein.

10. Defendant Cathy Norman ("Norman") is an employee of CST, and responsible to, receiving orders from, and under the domination and control of, the California defendants herein.

GENERAL ALLEGATIONS

11. Plaintiff does repeat, reallege, adopt, and incorporate by reference as though set out in haec verba herein, each allegation contained in paragraphs 1 through 10 hereinabove.

12. In 1981 Armstrong became disillusioned because his duties led him to archived papers disclosing critical personal frauds and organization deceptions perpetrated by other Hubbard intimates and by Hubbard himself during his years heading up Scientology. During his archiving activities Armstrong observed that over Hubbard's adult life he used a philosophy of "opportunistic hatred" and the "acts which flow therefrom (lying, cheating, stealing, compromising, entrapping, obstructing, bullying, blackmailing, destroying) as the solution to his problems."

13. In the 1960's Hubbard established this philosophy and practice as policy for the Scientology organization's treatment of people designated as "enemies," and dubbed this policy "fair game." The fair game policy states that "enemies" "may be deprived of property, injured by any means by any Scientologist...may be tricked, sued, or lied to or destroyed."

14. One of Scientology's mechanisms for implementation of fair game against a designated "enemy" is a policy and practice of character assassination, which Hubbard termed "black propaganda" or "black PR." The stated purpose of black PR is to destroy an "enemy's" reputation and credibility or public belief in him by the manufacture and spreading of falsehoods about him.

15. Fair game has been judicially condemned many times. In a landmark California proceeding, Los Angeles Superior Court Judge Paul G. Breckenridge, Jr. in his decision rendered in 1984 in the case of Scientology v. Gerald Armstrong, Case No. C420153. Judge Breckenridge stated in a now haunting declaration:

"In addition to violating and abusing its own members civil rights, the organization over the years with its "Fair Game" doctrine has harassed and abused those persons not in the Church whom it has perceived as enemies. The Organization clearly is schizophrenic and paranoid, and this bizarre combination seems to be a reflection of it founder LRH."

16. In response to such judicial and societal condemnation of its practices, defendants have claimed over the past many years that the fair game doctrine had been "canceled", is "no longer Scientology policy" and "no longer practiced."

Defendants claim that the people who were harassing and abusing others were doing so in violation of Hubbard's/organization policy, and as a result were purged from the organization. Defendant Miscavige, the present supreme director of all Scientology components, claims, in effect, that he was personally responsible "for the purge" and "for the elimination of fair game activities."

SPECIFIC ALLEGATIONS

17. Plaintiff does repeat, reallege, adopt, and incorporate by reference herein as though set out in haec verba herein, each allegation contained in paragraphs 1 through 16 hereinabove.

18. The grim truth however — and notwithstanding the repeated public Miscavige statements, as demonstrated infra — is that defendants herein have designated Armstrong an "enemy" and have from the time he left Scientology and up to the present subjected him to fair game and a massive international black PR campaign. The document which gives rise to this complaint was created and disseminated by defendant components of the Scientology enterprise pursuant to fair game, and is black propaganda.

19. Rather than deal responsibly with and actually eliminate their antisocial nature and practices as condemned by Judge Breckenridge, defendants have chosen to continue to subject designated "enemies," including Armstrong, to fair game and black PR. In their document which gives rise to this complaint, defendants seek inter alia to undermine the validity of Judge Breckenridge's decision by destroying Armstrong's reputation and credibility through the manufacture and dissemination of falsehoods about him. Clear, irrefutable proof is shown immediately hereinafter, that "fair game" and "black propaganda" are very much alive and spreading their frightening and historically contemptible poisons however, whenever, wherever, the Scientology's Miscavige-CSI-RTC-Sea Org cabal dictates.

20. Triggering this complaint: on October 21, 1996 one Cathy Norman caused transmission and publication of a one page letter on the letterhead of the Church of Scientology of Texas, Austin, to Craig Branch, Watchman Fellowship, P.O. Box 530842, Birmingham, Alabama, 35253. This letter showed a "cc: James Walker", thus broadening its publication. Copy by photocopy of the October 21, 1996 Norman-Branch letter marked Armstrong Exhibit A is annexed and incorporated herein.

21. One of the enclosures was an eight page document bearing a top line first date of 10-May-1993, followed by a court of law case name in capital letters and the date (emphasis added) June 20, 1984, viz :

CHURCH OF SCIENTOLOGY OF CALIFORNIA (PLAINTIFF)

vs.

GERALD ARMSTRONG (DEFENDANT)

June 20, 1984

22. As will presently be shown by plaintiff's allegations, the first three paragraphs of this May 10, 1993 forty-five hundred ± word critique by Miscavige-CSI-RTC-Sea Org of a June 20, 1984 decision of a State of California Superior Court Judge (Breckenridge) sent on October 21, 1996 by a Texas Scientologist loyalist (Cathy Norman) to an Alabama Watchman Fellowship adherent (Craig Branch) capsulize what this case is all about. The subject documents reached plaintiff Armstrong in Marin County, California before the month of November, 1996 was over. The first paragraph, including its "headline" (the "defendant" referred to is Gerald Armstrong, plaintiff here), reads:

"FALSEHOOD IN DECISION OF JUDGE BRECKENRIDGE:

"While defendant has asserted various theories of defense, the basic thrust of his testimony is that he did what he did because he believed that his life, physical and mental well being, as well as that of his wife were threatened because the organization was aware of what he knew about the life of LRH, the secret machinations and financial activities of the Church and his dedication to the truth."

23. The second paragraph of Armstrong Exhibit B, including "headline" reads:

"TRUE INFORMATION:

"Los Angeles Superior Court Judge Paul Breckenridge made the above statement as a part of a decision where the Church had sued Armstrong for theft of certain confidential documents from the Church. Far from any "dedication to the truth," Armstrong had boasted of his ability to lie and to forge documents."

24. The third paragraph then continues what can only be

described accurately — if fidelity to the 1970s precepts of L. Ron Hubbard himself is to be maintained — as a 1993 Miscavige-CSI-RTC-Sea Org dissemination out of California of an archetype, "fair game" implemented "Church of Scientology black propaganda document," viz:

"Gerald Armstrong is a former clerk¹ employed by Church of Scientology of California. During the later years of his tenure as an employee of the Church, Armstrong was placed in charge of a huge quantity of documents that belonged to L. Ron Hubbard that contained private and personal information regarding Mr. Hubbard. Part of his duties included research to support the work of an author who had been retained to write an authorized biography of Mr. Hubbard."

A copy of the full eight page document, marked Armstrong Exhibit B — with the 27 paragraphs each bearing an Arabic numeral (thus, 1 through 27) — is annexed and by such reference is incorporated herein.

25. The two documents, Armstrong Exhibit A and Armstrong Exhibit B, taken together, contain printed paragraphs constituting libel per se. The two documents, taken together, and as they were disseminated and mailed, constitute the malicious and defamatory statements concerning plaintiff Armstrong identified hereinafter. [Note, each "Item____" is keyed to an Armstrong Exhibit B number stamped (as in 1 through 27) on the left hand margin of Exhibit B."] Random partial highlighting of some of the twenty-seven

¹ The labeling by Miscavige CSI-RTC-Sea Org of Gerald Armstrong as "a former clerk" reveals another black PR habit of the Scientology people, that of persistently demeaning an "enemy" or adversary. The truth is that the Armstrong positions in the Sea Org actually included these: Ship's Legal Officer; Ship's Public Relations Officer, Ship's Intelligence Officer, L. Ron Hubbard's Deputy External Communications Aide, Deputy Commanding Officer of Hubbard's Household Unit, and L. Ron Hubbard Biography Researcher.

paragraphs support the initial Armstrong claims for relief.

- Item 2: "Gerry Armstrong far from being afraid for his life, was actively engaged in secret machinations his own to seize control of the Church...Armstrong has boasted at length of his ability to lie and to forge documents²."
- Item 3: "Gerald Armstrong is a former clerk..."
- Item 4: "Armstrong. . .left. . .taking with him huge numbers of confidential documents which belonged to Mr. Hubbard or his wife..."
- Item 5: "... the Church received evidence that Armstrong had stolen thousands of documents from Archives when he left the Church."
- Item 6: "Once the demand...was made, Armstrong turned the stolen documents over ..."
- Item 7: "...Church sued Armstrong for conversion, breach of fiduciary duty...and invasion of privacy based on Armstrong's theft of extensive amounts of papers owned by the Church or the Hubbards."
- Item 8: "His defense was stricken on four different occasions ³ by three different judges."
- Item 9: "Armstrong and Flynn were ordered to turn all copies of the documents that Armstrong had stolen over to the court. . ."
- Item 10: "The Church presented motions to prevent Armstrong from introducing the stolen confidential documents ...The Church was completely ambushed in the trial by these documents...the Church had no chance to

² As defendants know (or are charged with knowing) Miscavige CSI-RTC-Sea Org (or at least the latter surely know) the late L. Ron Hubbard, if it suited his purposes, unhesitatingly commanded document forgery and/or document alteration, just as he caused to be constructed — much of it still part of the Hubbard folklore — many egregiously false aspects of his own life history, accomplishments, and beliefs.

³ This defendants' statement is, simply, not true. The defense of justification, or privilege, was never stricken. The judges in pretrial phases did not permit the then defendant Armstrong to depend on the defense of "unclean hands," which would have barred then Plaintiff-Scientology from proceeding in limine.

prepare and put on that evidence before being hit with the documents in trial."

- Item 11: "...witnesses...testified...with regard to his alleged justification for stealing the documents."
- Item 13: "The Church had proven that Armstrong was guilty of stealing...Judgment, however, was entered in favor of Armstrong, essentially finding that...The only lawsuit that there was to fear was the one that was ultimately filed for return of the stolen documents."
- Item 14: "...when he committed these thefts Armstrong...was engineering a plan to infiltrate and take over the Church at the behest of the Criminal Investigation Division of the Internal Revenue Service..."
- Item 15: "...the Church obtained permission from the Los Angeles Police Department to conduct undercover surveillance of Armstrong⁴..."
- Item 17: "...his justification defense...was completely bogus..."
- Item 25: "The Court of Appeal upheld Breckenridge's decision on the legal technicality that it believed a justification defense is available to defend against theft in California."

⁴ Here, in this Exhibit B, the reader finds Miscavige-CSI-RTC-Sea Org, for whatever Scientology type purpose, not telling the whole (truthful part of the) story. In Item 15, above, the persons in charge untruthfully assert "the Church obtained permission from the Los Angeles Police Department." So too, in the Miscavige Declaration of February 8, 1994 (at page 31, lines 27-28, DM Declaration "under penalty of perjury) Mr. Miscavige swears that: "[Armstrong was proven a liar." In a police-sanctioned investigation. . ." What this head man's patent untruth does not reveal about their "undercover agent", one Eugene M. Ingram, the opinion of no less a public figure than the Chief of Police, Los Angeles. As the annexed Armstrong Exhibit E reveals (emphasis supplied) that: the letter is believed "to have been drafted by Ingram himself" and that "The Los Angeles Police Department has not cooperated with Eugene Ingram. It will be a cold day in hell when we do."

Item 27: "The Church recently sued Armstrong for his blatant disregard of his obligations under the settlement agreement...another Superior Court Judge was not impressed and slapped Armstrong⁵ with a preliminary injunction."

26. Plaintiff, upon learning of the existence of the subject libelous materials, called their existence to the attention of his undersigned counsel in Nevada attorney George Abbott. After lengthy Armstrong-Abbott discussion, the two agreed to make demand of and afford written opportunity for publication of full retraction by Ms. Norman, as well as by defendants CSI, RTC and Miscavige.

27. Prior to making demand for retraction, plaintiff and his legal counsel had concluded that the transparently provable facts constitute clear evidence that "fair game" and black PR" has pursued Gerry Armstrong up to today -- whatever misstated history and facts Scientology's all-powerful David Miscavige has chosen to rewrite. A photocopy of the letter sent to defendant Cathy Norman, with copies to CSI, RTC and Miscavige and dated February 12, 1997 is annexed hereto as Armstrong Exhibit C, and incorporated herein.

⁵ While defendants CSI-Miscavige et al choose to exult for a moment over issuance of a preliminary restraining order, plaintiff suggests that unaccustomed Scientology candor would at this point have less triumphantly revealed the other half of this "good news, bad news" vignette, viz, Judge Sohigian, while granting a narrow part of Scientology's requested injunction also stated that:

"[Scientology] involves abusing people who are weak. . .involves techniques of coercion. . . [there is] a very, very substantial deviation between [Scientology's] conduct and standards of ordinary, courteous conduct and standards of ordinary, honest behavior. . .[when dealing with Scientology] be sure you cut the deck. . .make sure to count all the chips."

28. The only response to the Norman-CSI-RTC-Miscavige directed letters came from one attorney Andrew Wilson, whose opening statement declared that "[t]his firm represents Church of Scientology International ("CSI") in the referenced matter and has been asked to respond to your letter," and who rejected plaintiff's demand for retraction out of hand. A photocopy of the letter received from Mr. Wilson and dated February 25, 1997 is annexed hereto as Armstrong Exhibit D, and incorporated herein.

29. Plaintiff does repeat, reallege, adopt, and incorporate by reference herein as though set out in haec verba herein, each allegation contained in paragraphs 1 through 28 hereinabove.

FIRST CLAIM FOR RELIEF

30. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 1 Armstrong had stolen Scientology's and Hubbard's documents (Exhibit B, ¶¶ 5,6,7,8,9,10,11,13,14,18)
This statement by defendants concerning plaintiff is false and libel per se.

SECOND CLAIM FOR RELIEF

31. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 2 Armstrong's defense of justification in his 1984 trial because of his fear of attacks by Scientology was a total farce, completely bogus, a fraud, and a fraudulent sabotage (Exhibit B, ¶¶ 2,14,17,20)

This statement by defendants concerning plaintiff is false and libel per se.

THIRD CLAIM FOR RELIEF

32. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 3 Scientology was ambushed by Armstrong and his attorney at trial and had no chance to prepare and put on evidence (Exhibit B, ¶¶ 10,12)

This statement by defendants concerning plaintiff is false and libel per se.

FOURTH CLAIM FOR RELIEF

33. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 4 Armstrong wanted to seize control of Scientology (Exhibit B, ¶¶ 2,14,16)

This statement by defendants concerning plaintiff is false and libel per se.

FIFTH CLAIM FOR RELIEF

34. On all of the foregoing allegations and pursuant to

applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 5 Armstrong sought to recruit dissident Scientologists to overthrow the organization (Exhibit B, ¶¶ 15,16)

This statement by defendants concerning plaintiff is false and libel per se.

SIXTH CLAIM FOR RELIEF

35. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 6 The Los Angeles Police Department granted Scientology permission to conduct undercover surveillance of Armstrong (Exhibit B, ¶ 15)

This statement by defendants concerning plaintiff is false and libel per se.

SEVENTH CLAIM FOR RELIEF

36. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 7 Armstrong created a plan to plant forged and incriminating documents in Scientology files to be found in a raid by the Internal Revenue Service (Exhibit B, ¶¶ 16,19)

This statement by defendants concerning plaintiff is false and libel per se.

EIGHTH CLAIM FOR RELIEF

37. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 8 Armstrong stated that neither truth nor good faith play any significant role in litigation (Exhibit B, ¶ 21)

This statement by defendants concerning plaintiff is false and libel per se.

NINTH CLAIM FOR RELIEF

38. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 9 Armstrong stated that facts mean nothing to a civil litigant and that truth is merely an avoidable obstacle (Exhibit B, ¶ 21)

This statement by defendants concerning plaintiff is false and libel per se.

TENTH CLAIM FOR RELIEF

39. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 10 Armstrong boasted at length of his ability to lie and to forge documents (Exhibit B, ¶ 2)
This statement by defendants concerning plaintiff is false and libel per se.

ELEVENTH CLAIM FOR RELIEF

40. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 11 The evidence shows Armstrong's state of mind to be of a calculating, aggressive and dishonest character (Exhibit B, ¶ 24)
This statement by defendants concerning plaintiff is false and libel per se.

41. The above falsehoods were known by defendants to be false and were manufactured and disseminated by defendants maliciously with the intention of causing plaintiff to be mistrusted, reviled, shunned, humiliated and further attacked, and as a result of defendants' manufacture and dissemination of the above falsehoods plaintiff was mistrusted, reviled, shunned, humiliated and further attacked.

42. Separately and together, these falsehoods, supra, were calculated to cause great injury to plaintiff's reputation, credibility and character.

43. Plaintiff has always enjoyed a good reputation for honesty, truthfulness and uprightness of character. Judge Breckenridge in his 1984 decision stated regarding plaintiff that

"he did what he did, because ... [of] his dedication to the truth;" and that his "testimony [was] credible, extremely persuasive."

44. The calculated, willful, reckless, and harmful mistreatment — with resulting physical, mental, and economic damages — exemplified by the allegations of each of the foregoing eleven claims for relief, directly caused the injuries to plaintiff's person alleged in the hereinafter alleged Twelfth Claim for Relief.

TWELFTH CLAIM FOR RELIEF

(Intentional Infliction of Emotional Distress)

45. Plaintiff does repeat, reallege, adopt, and incorporate by reference as though set out in haec verba herein, each allegation contained in paragraphs 1 through 44 hereinabove.

46. Plaintiff, for a twelfth claim for relief does allege that for more than fifteen years defendant David Miscavige — individually, and in concert with a handful of societal kin, with others making up an all-powerful "Scientology" cabal — has been engaged in a relentless, never-interrupted course of conduct designed to destroy plaintiff Gerald Armstrong.

47. The methods of destruction at hand were those approved, indeed in no small part invented by the now deceased L. Ron Hubbard. Central to the chosen means were the "fair game" and "black propaganda" techniques and practices described hereinabove. Defendant Miscavige was not above indulging in false, wholly untrue, harmful and spiteful, even inhumane, statements, including even those "under penalty of perjury", as exemplified by the exposition of Miscavige sworn and unsworn public statements to

the light of truth, supra. As two examples of this defendant's willingness to be untruthful: this complaint specifically identifies DM's "sworn under penalty of perjury" declarations embracing the much-vaunted Miscavige insistence that "early on, I ended fair game, once and for all"; so too, the Miscavige flat out claim an "undercover agent" was "sanctioned" by the Los Angeles Police Department, a claim proven to be a lie. See Armstrong Exhibit E.

48. A search by plaintiff through discovery will be needed to confirm (or to deny) the many and diverse rumors afloat regarding the degree of "fair game" and "black propaganda" directed at Armstrong over the past fifteen year period, and currently.

49. Meantime plaintiff alleges unbridled misconduct — by defendant Miscavige, and/or under his control and direction, and/or within his knowledge and acquiescence at all times, all within the purview of the defendants and each of them — which conduct has been and is, designed to inflict nonstop severe and grossly damaging emotional distress.

50. (a) By means of the premises herein established, these defendants and each of them have unlawfully and maliciously caused plaintiff to become greatly vexed, harassed, and injured, have caused him to suffer great mental and nervous strain, and caused his feelings to be hurt.

(b) Defendants' misconduct has also caused plaintiff to be exposed to, and to have suffered, intended or actual public and institutional (e.g. Watchman Fellowship) hatred, contempt, and obloquy, all constituting misconduct designed to deprive him of public confidence and social intercourse in the communities in

which he has resided or where he has sojourned.

(c) The actions of defendants designed to destroy plaintiff — embracing "destruction" in all its forms, literally, physically, psychically, mentally, in his livelihood, in ordinary senses of well being, through every form of intentional infliction of emotional distress — in compensatory damages in amount upon proofs to be adduced but estimated to exceed \$900,000 from and after May 10, 1993. On said premises, and by reason of the aforesaid acts of defendants, plaintiff has sustained serious actual damages, in an amount to be proven at trial, but no less than the minimum jurisdictional amount for this Court.

TRIAL OF THIS MATTER BEFORE A JURY IS DEMANDED.

WHEREFORE, plaintiff prays for damages against all defendants, jointly and severally, as follows:

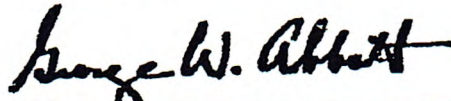
ON ALL TWELVE CLAIMS FOR RELIEF ABOVE SET OUT

1. For general damages according to proof at trial.
2. For special damages according to proof at trial.
3. For costs of suit.
4. For punitive damages; and
5. For such other relief as the Court may deem just.

Dated: Minden, Nevada
November 21, 1997,

Respectfully submitted,

GEORGE W. ABBOTT, CHARTERED

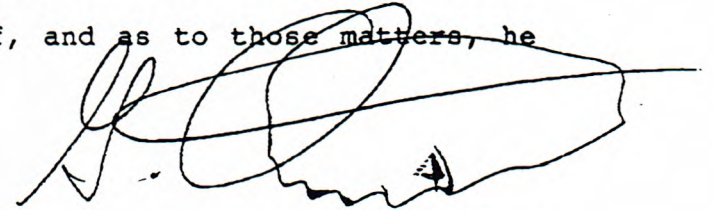


George W. Abbott

STATE OF NEVADA)
 : ss.
COUNTY OF DOUGLAS)

GERALD ARMSTRONG, under penalty of perjury, makes the following assertions:

He is the plaintiff in the above-entitled action; that he has read the foregoing Complaint for Libel and for Defamation, and for Other Relief and knows the contents thereof; that the same is true of his own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, he believes it to be true.



Gerald Armstrong

Subscribed and sworn to before
me this 21st day of November, 1997.


Notary Public



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March 6, 1997

David Miscavige
RTC

Dear David:

Not many days ago I was led to somebody's web page which contained a portion of Scientology's IRS form 1023 submitted in 1992. Because of what I found, and other threats from your organization, I left the US.

This 1023 submission made clear to me finally why you have attacked me so violently since the 1986 "settlement," and indeed why you contrived the "settlement" to take the form it did, even though I continued through the years to try to achieve a sane and lasting peace. You believe that your billions and billions depend on my destruction.

Your submission contains the same lies about me, the same attacks in all the black PR/DA packs and court filings that you have had your organization manufacture since the "settlement." Happily, as I'm sure you've noticed I've said before, since you are personally responsible you can do what is necessary to correct it all.

With this letter I am offering you another opportunity to right the wrongs done, to correct the record without further conflict. If you wish to take advantage of this opportunity please immediately communicate your willingness to meet with me by advising my attorney who will forward this letter to you.

Your refusal to participate in such a correction of the record by meeting with me will signal to me your choice to continue your unjustified attack on me and others. In that event I will, for everyone's sake, correct the record in a number of ways and on a number of channels.

1. I will communicate the truth behind the falsehoods in your 1023 submission, both to the IRS and to other US government agencies responsible.
2. I will do what is necessary to bring about a Congressional awareness of the false submission, and what I know about your related activities, including, but not limited to, your attacks on and compromise of my attorney Michael Flynn.
3. I will communicate what I know about the falsehoods underlying your organization's US tax exemption and your related activities to any foreign government in countries where you have used the US tax exemption to forward or defend your activities.
4. I will investigate the truth or falsity of every charge you have made against every other person or entity in your submission(s) to the IRS; e.g., Michael Flynn, Laurel Sullivan, Lawrence Wollersheim, Charlie O'Reilly, Gene Allard, Roxanne Friend, Toby Plevin, FAMCO, CAN.
5. I will do whatever I can to bring the US to reverse its improper decision granting your organization tax exemption.
6. I will seek a Congressional investigation of the IRS's dereliction of duty in its failure to investigate your false responses to its queries, and its granting of tax

David Miscavige
March 6, 1997
Page 2 /

exemption, when it had plenty of knowledge of your organization's history of lying and obstruction of justice. I will also seek an answer to why this Great Nation surrendered in the legal and extra legal war you waged with it, and thus abandoned the individual victims it should have defended.

7. I will communicate all these matters to the media so that further investigation can be initiated.

8. I will write and speak publicly and openly on these matters to anyone who cares to hear. I will publish my story and thoughts.

9. I will make this letter public, and on its basis and on the facts known to me I will solicit the funds to prosecute the necessary litigation to correct your wrongs.

10. I will take appropriate legal action against you and the various organization components and persons responsible pursuant to RICO and civil rights statutes. The precedent acts begin with your first post "settlement" threat, and run through every threat, every lie, every effort to have me jailed or otherwise punished or harmed, every obstruction of justice, and every use of the law to harass.

Please do not continue to make the error of believing your own attacks and lies. All your black PR has not damaged my character, although it has damaged the character of its originators. You state in your 1023 submission that your "evidence proved conclusively" [my] "state of mind"..."to be one sordid sado-masochistic nightmare." You know this charge, which, I know you can imagine, tears at my heart, is untrue. You must know as well that this sort of base calumny has no place in your organization's statements to anyone, and certainly not to the IRS or a government.

I believe you have an easy decision. With my help it is entirely possible your organization can retain its tax exempt status, resolve its legal problems, and achieve a sane and lasting peace. If you insist on continuing your attack on me and others, you and your organization will face terrible and perhaps insurmountable difficulties.

I am writing directly to you so that it rests upon you to advise all of Scientology of the position in which you have placed it. All Scientologists will in any case soon learn either that you put them at risk with dishonesty or that you have acted wisely to reduce the needless threat to their survival and happiness.

I have stated in many communications which you have received through these years that I have other things I wish to do in my life, things, very dear, and untearing, to my heart, different from defending myself and others from Scientology. I have no interest, no matter what you think, in bringing you or anyone else to your knees. God does that.

Nevertheless, I cannot ignore the truth that I have been given a role, by your unceasing attacks on me if not by His Guidance, in the resolution of the Scientology conflict. Nor can I ignore the truth that your threats and attacks make my doing those things dear to my heart impossible until the conflict is ended.

I pray that you will see that by my writing you I am still hopeful that you will choose to avoid what will be, no matter what you henceforth do to try to harm me,

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David Miscavige

March 6, 1997

Page 3 /

certain calamity. I pray that you will immediately communicate your willingness to meet with me and my attorney. You may bring with you whatever attorney or attorneys you desire. My attorney will decide on the venue in a discussion with your designated attorney.

I pray to God that we all do the right thing.

Yours urgently,

Gerry Armstrong

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GEORGE W. ABBOTT, CHARTERED
Law Offices

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March 25, 1997

Certified - RRR

Mr. David Miscavige
Religious Technology Center
1710 Ivar Avenue, Suite 1100
Los Angeles, California 90028

Re: Transmission of Armstrong-Miscavige letter

Dear Mr. Miscavige:

A little more than a fortnight ago my friend and neighbor Gerry Armstrong sent to me a letter dated March 6, 1997 and addressed to you, with a request that I forward it to you with or without adding my own comments, as I should so choose, and as an attorney working in his interests.

In the meantime, much of my available time has been devoted to determining whether I should, at this time, make any personal observations prompted by my reading and rereading — against related, researched facts and conclusions independently reached by me — of the subject Armstrong-Miscavige communication.

My decision is uncomplex. I shall refrain at this time from adding any of my own observations, but two: I trust that you will perceive Gerry's letter to be of signal, even of watershed, importance and that you will proceed to act accordingly. And, it is most devoutly hoped that, from your most high position, you and your key associates will react and respond responsibly and constructively to the end, in Gerry's words and with his help, that those within and without the protracted Scientology-Armstrong history of events will "achieve a sane and lasting peace."

In the fourth full paragraph of Mr. Armstrong's March 6, 1997 letter we find these words: "If you wish

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Mr. David Miscavige
March 25, 1997
Page Two

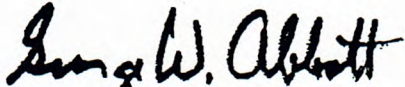
to take advantage of this opportunity please immediately communicate your willingness to meet with me by advising my attorney who will forward this letter to you." I, of course, am that attorney.

On the foregoing but with a slight modification (underlined) "If you wish to take advantage of this opportunity, or if you do not, please immediately communicate your willingness or unwillingness to meet with me by advising my attorney who will forward this letter to you."

I shall construe "immediately" to embrace seven (7) calendar days from the date of receipt in your office of this (Abbott) letter with its enclosed (Armstrong) letter, as evidenced by an executed return receipt.

I look forward to a timely and meaningful response.

Yours constructively, and professionally,


George W. Abbott

Enclosure

cc: Gerald Armstrong

GEORGE W. ABBOTT, CHARTERED
Law Offices

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May 5, 1997

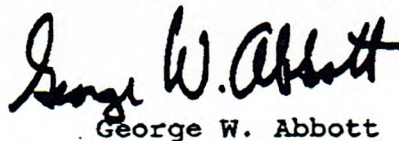
Mr. David Miscavige
Religious Technology Center
1710 Ivar Avenue, Suite 1100
Los Angeles, California 90028

Dear Mr. Miscavige:

Mr. Gerald Armstrong has asked that I pass on to you by FAX the documents sent to you originally by certified mail on March 25, 1997, but returned unclaimed, viz, [1] Abbott - Miscavige, letter (2 pps.) dated March 25, 1997; and [2] Armstrong - Miscavige letter (3 pps.) dated March 6, 1997.

It is the request of Mr. Armstrong that you be asked to respond to his letter by Facsimile to this office on or before close of business, Friday, May 9, PDT. Otherwise it is Gerry's intention to commence the ten-point program outlined in his letter of March 6.

Very truly yours,



George W. Abbott

GWA:ma

Enclosure

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WILSON CAMPILONGO LLP
405 SANSOME STREET, SUITE 400
SAN FRANCISCO, CALIFORNIA 94104
(415) 391-3900
TELECOPY (415) 954-0938

ANDREW H. WILSON

May 8, 1997

VIA FACSIMILE (702) 782-8362

George Abbott, Esq.
2245-B Meridian Blvd.
P.O. Box 98
Minden, Nevada 89423-0098

Re: Gerry Armstrong
Our File No. SCI02-003

Dear Mr. Abbott:

I write in reply to your letter of May 5, 1997 which, as was your last letter, referred to me for reply. As I am sure you are aware, I have represented the Church of Scientology ("CSI") since early 1992 in its efforts to enforce the Settlement Agreement of December 6, 1986.

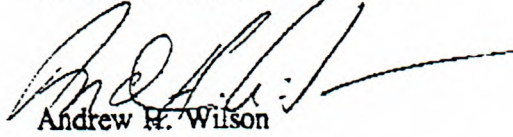
My representation naturally includes dealing with the various threats and demands which your client and friend has made in the past five years. His letter of March 6, 1997, is not the first letter of this type that we have received. I trust that you have familiarized yourself with that prior correspondence, so I will not waste time here by discussing it in detail. It suffices to note that all of this correspondence follows an all too familiar pattern - a regurgitation of Mr. Armstrong's view of the Settlement Agreement, its alleged unenforceability, CSI's alleged persecution of Mr. Armstrong, Mr. Armstrong's professed desire to make peace with CSI, threats to expose certain unspecified facts which Armstrong hints would damage CSI, allusions to Mr. Armstrong's ability to benefit CSI ("With my help, it is entirely possible your organization can retain its tax exempt status..."), underlying all of which is the odor of attempted blackmail.

Mr. Armstrong professes interest in "a sane and lasting peace." That is just what CSI bargained and paid for in the 1986 Settlement and is just what its efforts to enforce that agreement have been aimed at. Since my involvement began in early 1992, I have been witness to a multitude of actions on the part of Mr. Armstrong which were clear attempts to provoke action by CSI. Despite these clear provocations, CSI has acted with remarkable restraint, and has only sought relief for the most egregious of Mr. Armstrong's actions.

A meeting between Messrs. Miscavige and Armstrong would serve no purpose. Mr. Miscavige has no involvement with Mr. Armstrong and has not even seen him since 1981. This matter is between Armstrong and CSI. We seek nothing more than the peace we have already bargained for. If Mr. Armstrong would simply obey the Court's permanent injunction, there would be peace. Armstrong, on the other hand, while he professes only a desire for peace, actually wants to ignore his obligations under the Settlement Agreement and the Court's injunctive order. If he wants peace, he can abide by that agreement, and there is no need for any meeting. If he wants something other than that, CSI is unwilling to negotiate. However, in the interests of courtesy, I will be happy to meet with either you or Mr. Armstrong, or both of you, on CSI's behalf and to discuss whatever is appropriate.

Very truly yours,

WILSON CAMPILONGO LLP


Andrew R. Wilson

AHW-1978.LTR

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ANDREW H. WILSON

WILSON CAMPILONGO LLP
115 SANSONE STREET, SUITE 400
SAN FRANCISCO, CALIFORNIA 94104
(415) 391-3900
TELECOPY (415) 954-0938

November 27, 1997

VIA FACSIMILE TO (702) 782-8362

Mr. Gerald Armstrong
2245-B Meridian Blvd.
P.O. Box 98
Minden, Nevada 894234-0098

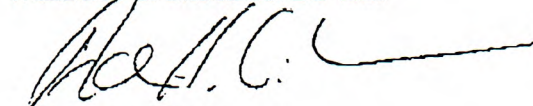
Re: Ex Parte Appearance for OSC re contempt
Our File No. SCI02-003

Dear Mr. Armstrong:

I write to apprise you that I shall appear December 2 at 9:30 a.m. before the Hon. Gary Thomas in Courtroom H of the Marin County Superior Court to seek an order to show cause re contempt arising out of your recent actions in creating and publishing certain documentary works over the internet, in granting interviews to various English and German media and other actions taken by you while in Germany.

Very truly yours,

WILSON CAMPILONGO LLP



Andrew H. Wilson

AHW-3047.LTR:ks

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S

I just received the following letter:

[Quote]

WILSON CAMPILONGO LLP
115 Sansome Street, Suite 400
San Francisco, CA 94104

November 27, 1997

VIA FACSIMILE TO (702)782-8362 (December 1, 1997)

Mr. Gerald Armstrong
2245-B Meridian Blvd.
P.O. Box 98
Minden, Nevada 89423-0098

Re: Ex Parte Appearance for OSC re contempt
Our File No. SC102-003

Dear Mr. Armstrong:

I write to apprise you that I shall appear December 2 at 9:30 a.m. before the Hon. Gary Thomas in Courtroom H of the Marin County Superior Court to seek an order to show cause re contempt arising out of your recent actions in creating and publishing certain documentary works over the internet, in granting interviews to various English and German media and other actions taken by you while in Germany.

Very truly yours,

WILSON CAMPILONGO LLP
Andrew H. Wilson

[End Quote]

I can't make the 0930 appearance, and if anyone else can, please feel free. (Marin SC No. 157680)

I think cult leader David Miscavige is so desperate for a "win" at any cost that he sends his pettifoggers and PIs after me because I'm such an easy target. Imagine DM convincing all his lieutenants and paid professionals that Gerry Armstrong must be stopped, as if I'm some kind of threat to anyone. The only possible threat I could be is if the cult continues to attack me, not because of anything I do but because they attack themselves.

This latest effort to have me jailed should put to rest forever Scientology's claims of persecution. Nobody is seeking to stop Scientologists from speaking freely. It is only the Scientologists who seek to stop free speech. Nobody is trying to suppress the Scientologists from their expression of their religion. It is only the Scientologists who are trying to

suppress religious expression.

Remember, the only thing Scientology is trying to prevent in having me jailed is my speaking the truth. What I am trying to prevent in speaking the truth, and in bringing my defamation case, is Scientology's black propaganda campaign of lies.

I have absolutely no regrets, as unhappy and as threatened as Miscavige and his Scientologists have at times made my life, for speaking out and offering my help to people this cult has been abusing. It only takes one person to bring to light Scientology's suppression of speech and religious expression with its criminal "contracts" and their judicial and extrajudicial enforcement. And it only takes one person to ultimately have these "contracts" and Scientology's suppression of basic human rights judicially and societally condemned and ended forever. Fortunately I have thousands of fellow fighters who meet here on ARS to see this task to its happy end.

Thanks.

Gerry

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This communication is directed to the Scientology organization.

Please direct to appropriate terminal.

Today one of your agents brought a document by the office of George Abbott, my attorney in Armstrong v. Miscavige, USDC, District of Nevada, No. CV-N-97-0670-HDM (RAM) for the purpose of serving me with what I understand to be an Order to Show Cause re Contempt in the case of Scientology v. Armstrong, Marin SC No. 157680.

As you know on 12/1/97 I posted Andrew Wilson's fax letter giving notice of his 12/2 ex parte application for the OSC.

Mr. Abbott put your agent on the phone to talk to me. She said that she would get in trouble, or something like that, if she wasn't able to serve me personally. She also made silly statements about George and I being upset, and I say silly because neither George nor I was upset with anything, least of all her, because she seemed, other than the couple of times she made these silly statements, a perfectly nice person. I am aware that you would have an interest in your agent developing a scenario in which Mr. Abbott or I was something different from polite. I explained to her that I expect to be in Mr. Abbott's office within two weeks, and that when I know that I will be there I will call her number and she can come by to serve me. She had said she was from Sacramento, and seemed willing to travel all the way to Canada to serve me; so I thought I had made an altogether wise, fair and frugal offer.

Well, she refused to give Mr. Abbott her office number. So I figure you are just looking for a an excuse to stake out and drop by my resting spot in Canada and serve me, and so get your money's worth for the PIs you've paid to spy on me.

Well, please do not do that. If I don't show up within 2 weeks, and don't accept service of your papers in Mr. Abbott's office within 2 weeks, you can go wherever you want to serve me.

I know that there is no reason, let alone urgency, to serve me in the next 2 weeks. By implying that there is you are harassing and terrifying me, and if your process server shows up at my resting spot in Canada you will be harassing and terifying the people near me.

I know you read these messages. You based your application for the OSC, after all, on my posts to ars. So I know you can call off your PIs. Even if they're enroute at this moment.

I am aware you have had PIs close to me over this past week.

I will be in Mr. Abbott's office within two weeks.

Please acknowledge this post.

Gerry Armstrong
c/o George W. Abbott, Esquire
2245-B Meridien Boulevard
P.O. Box 98
Minden, NV 89423-0098
(702)782-2302

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U

Commission on Security and Cooperation in Europe
Sen. Alfonse D'Amato, Chairman,
Rep. Christopher H. Smith, Co-Chairman,
and all Commissioners
Ford House Office Building, Room 234
Washington, D.C. 20515

Oct 18, 1997

Re: Religious Intolerance in Europe: the Scientology connection

I have learned that the CSCE is holding hearings on this subject, and I wish to add to your discussion some of my experiences, knowledge and opinions.

I know that some Scientology celebrities and perhaps some apologists for the organization have spoken to the Commission. I also understand that Scientology's claim of religious persecution in Europe, particularly Germany, is the basis for these celebrities' appearance at the hearing and one of the bases for the hearing itself.

In my opinion it is Scientology's own persecution of its members, ex-members and critics which is the source of most of its problems in Europe. I believe that Scientology's use of the shield of religion to carry out its abuses and persecutions is a real threat to freedom for legitimate, non-abusive religions. I believe that the US has turned its back on the victims of Scientology's abuses and persecutions, the very individuals who should be protected by the Constitutional guarantee of religious freedom. Finally, I believe that until it is willing to examine and act to curtail its own brand of religious persecution the US will lack the probity to preach about other countries' religious persecutions.

It is my prayer for this Commission that it urge the US to take the lead in eliminating religious persecution by examining and dealing with the religious persecution within its own borders and exported by its own organizations.

I am writing to you from Canada. Earlier this year it was necessary for me to leave the US, where I had been a resident since 1975, because I am the target of the Scientology organization's religious persecution in your country. This persecution, using the power and authority of the US legal system, resulted in a court order which prohibits me, on penalty of being jailed and fined, from mentioning Scientology or Scientologists or discussing my Scientology experiences.

I believe that this court order is illegal and that Scientology procured it by illegal means. It impermissibly denies me freedom of speech, freedom of religion, freedom of association

and due process. In effect it results in a form of legal and psychological slavery. I am in Canada where I am free to discuss Scientology and my experiences, and where I may freely express my religious thoughts about this "religion."

The Scientology organization is well known for its policy of "using the law to harass." It spends many millions of dollars every year on lawyers and private investigators to harass individuals it designates as "enemy" targets. It overwhelms these targeted individuals with aggressive litigation, financial ruination, and extralegal operations and threats. Very few people have the money, strength or courage to stand up to this organization and its antisocial tactics. Even the US government, while it has stood up to military aggression of tyrannical foreign national regimes, has succumbed to the "religious" aggression of this US-based "church" of Scientology.

I was in Scientology from 1969 through 1981, spending most of those years with its founder L. Ron Hubbard in the Sea Organization, Scientology's "elite" pseudo-military corps. I was on the Sea Org ship "Apollo" with Hubbard, where I was posted as, inter alia, the ship's legal officer and intelligence officer. Hubbard patterned his intelligence apparatus on the system of Nazi spy master Reinhard Gehlen. Scientology operates as a global intelligence organization collecting overt and covert information on individuals, other organizations and governments and running covert operations against its "enemies."

During my Sea Org years I was twice assigned by Hubbard personally to Scientology's Rehabilitation Project Force ("RPF"), first in Florida, then in California, for a total of 25 months. The RPF is a penal camp created by Hubbard to punish anyone he felt crossed his will, or he even just disliked. People were assigned arbitrarily, for something as slight as a needle movement on the E-meter, the electro-psychometer Scientology calls for "legal" reasons a "religious artifact," but which in reality is a lie detector. I was assigned by Hubbard the first time for "insubordination," and the second time because he considered I was "joking." During much of my RPF sentence I was the "Bosun," the highest RPF member and in charge of the group. I became intimately familiar with RPF policies and practices.

The RPF is, and is intended to be, a degrading experience to break the will of the person assigned. RPF members were segregated, did physical or menial labor for little or no pay, were required to run everywhere, and ate whatever was left after the regular Scientology staff members finished eating. Telephone calls from RPF members to their family were only by specific permission and were monitored. All mail from RPF members was first read by security personnel. Anyone who took the punishment of RPF assignment lightly was assigned to the RPF's RPF, an even

more degrading experience. People assigned were not free to leave, and anyone who did wish to leave was guarded and held until he had, among other things, signed a list of his "crimes" extracted from his "auditing" files.

Auditing is Scientology's psychotherapeutic processing, which it claims produces increased abilities and awareness. Statements made by a person being audited are recorded by an "auditor." These statements, which include the person's innermost thoughts, embarrassing incidents from his past, his sexual history, acts which might be legally prosecutable, etc. are available to and used by the intelligence personnel and leaders of the organization for non-therapeutic purposes, such as domination, intel operations or blackmail. Scientology promotes to the public that statements made in auditing are confidential. They are not.

My last position inside Scientology involved assembling an archive of Hubbard's personal documents and providing research assistance to non-Scientologist author Omar Garrison who had been contracted to write Hubbard's biography. In the course of my research I uncovered and documented pervasive fraud concerning representations made by Hubbard and Scientology about his past, credentials, accomplishments, intentions and the claims and efficacy of his psychotherapeutic "mental technology." I attempted to get Scientology's leaders to correct the fraud, and as a result I was ordered to a "security check," an interrogation employing the E-meter.

I saw that the trust I had placed in Hubbard and Scientology had been betrayed from the very beginning, that the organization's leaders were ill-intentioned, and that the fraud I sought to correct would continue. My wife and I were fortunate in being able to escape from the organization, because if we had announced our intention to leave we would have been separated and locked up. I had seen many people locked up and guarded inside, and I had been locked up and kept under guard myself.

Shortly after I left, Scientology published "Suppressive Person Declares" on me, falsely accusing me of crimes and high crimes including promulgating false information about Hubbard and Scientology. The organization's declaring someone a "suppressive person," or "SP," subjects him to its infamous and judicially condemned "Fair Game Doctrine," which permits SPs to be "deprived of property, injured by any means by any Scientologist... tricked, sued, or lied to or destroyed." Being "declared" by Scientology can be a terrifying experience.

During the first few months after I left the organization I learned of an intelligence operation being conducted against me and picked up surveillance. Scientology personnel also stole

photographs I possessed. Knowing that my wife's and my life were in danger, I obtained from Garrison, with his permission, certain documents I believed I would need to defend us. I sent these to attorneys who had agreed to represent me, one of whom was Michael Flynn, then Scientology's most prominent lawyer enemy.

From the time I left the organization until the present I have been the target of fair game. Acts against me by Scientology agents pursuant to this basic Scientology policy include:

- filing five lawsuits against me;
- following, surveilling and harassing me and my wife;
- spying in our windows and upsetting our neighbors;
- attempting to involve us in a freeway "accident;"
- assaulting me;
- striking me bodily with a car;
- threatening to put a bullet between my eyes;
- attempting on more than 12 occasions to have me prosecuted on false criminal charges, including by the FBI;
- stealing a manuscript and artwork from my car;
- filing false sworn statements about me in various litigations;
- extracting and disseminating information from my supposedly confidential auditing files;
- illegally videotaping me;
- attempting to entrap me in the commission of a crime;
- threatening me on several occasions if I testified about my knowledge of Scientology;
- threatening my friends;
- subjecting me to a massive international "black propaganda" campaign.

Black propaganda or "black PR" is the term Hubbard gave to Scientology's policy and practice of destroying a target's reputation and credibility or public belief in him by the manufacture and spreading of falsehoods about him. Over the years Scientology has published and disseminated a small mountain of black PR on me, falsely accusing me of perversities and crimes, including crimes against humanity, in an ongoing effort to assassinate my character.

The first case Scientology filed against me went to trial before Los Angeles Superior Court Judge Paul G. Breckenridge, Jr. in 1984, resulting in a decision in my favor. Judge Breckenridge stated:

"In addition to violating and abusing its own members civil rights, the organization over the years with its "Fair Game" doctrine has harassed and abused those persons not in the Church whom it perceives as enemies. The organization clearly is schizophrenic and paranoid, and this bizarre combination seems to be a reflection of its founder LRH[Hubbard]. The evidence portrays a man

who has been virtually a pathological liar when it comes to his history, background and achievements. The writings and documents in evidence additionally reflect his egoism, greed, avarice, lust for power, and vindictiveness and aggressiveness against persons perceived by him to be disloyal or hostile."

Judge Breckenridge condemned as well Scientology's abuse of its participants' auditing or psychotherapy records: "culling supposedly confidential "P.C. folders or files" to obtain information for purposes of intimidation and/or harassment is repugnant and outrageous." (LASC No. C 420153)

This decision was affirmed on appeal, *Scientology v. Armstrong* (1991), 232 Cal.App.3d 1060, 283 Cal. Rptr. 917.

Scientology also subjected my attorney Michael Flynn to fair game attacks, which included infiltrating his office, threatening his family, paying known criminals to testify falsely against him, suing him and his office some fifteen times, framing him with the forgery of a \$2,000,000 check, and targeting him with an international black PR campaign. (See, e.g., *U.S. v. Kattar*, 840 F.2d. 118). Flynn became desperate to have the attacks and threats end, and ultimately, due to that desperation, compromised his ethical responsibilities to his clients.

In December, 1986 Scientology and Flynn entered into an agreement to settle all his some twenty clients' claims against the organization, plus Flynn's own lawsuit seeking damages for the years of fair game. I was to settle my cross complaint for the years of abuse inside Scientology and the years of fair game after I left. Scientology and Flynn positioned me as a deal breaker, only showing me the "settlement agreement" they wanted me to sign after my arrival in Los Angeles from Boston, where I had been working in Flynn's office.

I protested that I could not sign the document, which required that I be absolutely silent about my then 17 years of experiences with Scientology, and which contained a \$50,000.00 liquidated damages penalty for any utterance I might make to anyone. In response Flynn stated that the conditions were "not worth the paper they're printed on." He told me, "You can't contract away your Constitutional rights; "the conditions are unenforceable." When I argued that the settlement document opened me up to future problems with Scientology Flynn said, "I'll be there for you."

Flynn said that he was sick of the litigation, the threats to him and his family and wanted out, that Scientology had ruined his marriage, his wife's health and his life. He said that as a part of the settlement he and all co-counsels had agreed to not

become involved in organization-related litigation in the future. He expressed a deep concern that the courts in this country cannot deal with Scientology and its lawyers and their contemptuous abuse of the justice system. He told me that if I didn't sign I could look forward to more years of fair game harassment and misery.

Flynn told me that the settlement's global form was to give Scientology the opportunity it sought to change its combative attitude and behavior by removing the threat he and his clients represented to it. He said Scientology had promised to cease fair game and that he and all his clients depended on my signing to have fair game against them cease. Because of Flynn's representations that the offensive conditions were not worth the paper they were printed on, and to have fair game end for Flynn, his family, his other clients and myself, I did sign Scientology's document.

Although I sought peace and did nothing to irritate Scientology, the organization had no intention of ending fair game attacks on me or anyone else. Immediately following the settlement Scientology delivered black PR documents about me to the Los Angeles Times. Over the next three years, and before I responded in any way, Scientology's attacks included:

- delivering black PR to various media representatives;
- publishing its own false and defamatory descriptions of my Scientology experiences;
- disseminating to the media an edited and defamatory version of the illegal videotape it had made of me;
- disseminating my own documents which had been sealed in my case;
- filing affidavits about me in a civil lawsuit in England which falsely charged that I had violated court orders and was an admitted agent provocateur of the US Government;
- threatening to sue me if I even talked to attorneys in the case in which the false charges were being made;
- threatening to expose a private writing if I did not assist Scientology's effort to prevent a third party litigant from accessing my LA Superior Court file;
- threatening to sue me if I testified even after being served with a deposition subpoena.

In the fall of 1989, after service of the deposition subpoena in the case of Bent Corydon v. Scientology, I received a series of telephone calls from Scientology attorney Lawrence Heller which were threatening and troubling. Heller threatened that I could be sued if I testified about my experiences, even though I had been subpoenaed, and that I should refuse to answer the deposition questions.

As a result of Heller's threats and Scientology's other

post-settlement fair game I concluded that the settlement agreement and the organization's efforts to enforce it were acting to obstruct justice, and that if I allowed myself to be intimidated by the threats I would be abetting that obstruction. I concluded that I could not avoid a confrontation with Scientology, and subsequently responded to defend myself and to try to correct the injustices created by the settlement agreement and its misuse.

From that time until the present many people who consider themselves victims of Scientology's abuse have contacted me to request my assistance in their efforts to obtain redress or defend themselves. I have come to believe that all people have a God-given right to assist their fellows, which cannot be taken away by human "contract." I have also come to see that a person's right to participate in a public controversy, certainly a controversy involving himself, should not and cannot be taken away by "contract."

In the case of Scientology v. Armstrong, Marin County Superior Court Case No. 157680, the organization was awarded by summary judgment \$300,000 in liquidated damages, \$320,000 in costs and a permanent injunction prohibiting me from discussing Scientology or Scientologists, or assisting in any way Scientology's victims or fair game targets. This judgment is suspect because, among other things, the judge completely ignored and refused to address the First Amendment religious issues and defense.

The judge ruled that Scientology may say whatever it wants about me, no matter how false, obnoxious or defamatory, and that I may not respond in any way to defend myself. To arrive at this conclusion he also ignored and refused to address a sworn declaration by Scientology attorney Heller that the organization, which had published false statements about me after the "settlement," was also bound by its non-disclosure conditions. Heller had filed this declaration in the Corydon litigation in an effort to prevent my deposition from going forward.

I had never agreed to be Scientology's defenseless punching bag. I believe that a judgment in a US court which orders that someone submit to being a punching bag, especially to a known abusive and dangerous organization like Scientology, is itself abusive and dangerous, and illegal. That Scientology should use the US courts to obtain such an order and unfair advantage is indicative of its antisocial goals and disregard for civil rights and basic equity.

Scientology's policy and practice of attacking and compromising judges presiding over its legal proceedings is well known. (See, e.g., The American Lawyer article, December 1980,

"Scientology's War Against Judges.") This article, which focused on the criminal trial of 11 Scientology intelligence personnel in connection with their burglarizing of US Federal offices and theft of government documents, stated that Scientology's

"strategy amounts to an all-out war against the D.C. district court judges, a war much more sophisticated, better financed and more successful than the bizarre tactics used by some other groups against their courtroom adversaries, such as Synanon's attempt to murder an opposing counsel by putting a rattlesnake in his mailbox."

This all-out war continues to this day, and renders suspect every legal decision obtained by Scientology, including the tax exemption it obtained from the IRS in 1993.

After Scientology sued me following the "settlement" I learned from Michael Flynn that he had signed a "contract" with Scientology which prevents him from assisting me in my defense. His promise to be there for me was merely an inducement to get me to sign so that fair game toward him would end. Throughout the post-settlement litigation, Flynn, while admitting that his contract with Scientology is illegal and unenforceable, has refused my requests to come forward, stating that he fears again having his life ruined by more fair game. This too is indicative of the organization's continuing antisocial goals and rights abuses.

Early this year I was served with a subpoena for production of documents by Grady Ward in the case of Scientology v. Ward, USDC Northern District of California. Ward is accused of posting some of Scientology's "secret scriptures" to the internet. After receipt of the subpoena I received a letter from a Scientology attorney threatening me if I produced the requested documents. I therefore advised the presiding judge in the Ward case of the threat. Scientology was able to then obtain an order of contempt against me for communicating to the federal judge, sending me to jail and fining me.

Also early this year I discovered that in its 1991 IRS Form 1023 submission, pursuant to which it obtained its tax exemption, Scientology included a four page section about me containing the same black PR the organization spreads to the media and public. What Scientology wrote about me, in response to the IRS's questions concerning my Scientology-related litigation is factually and in conclusion false. Scientology submitted these false statements to the IRS during a time when it believed it had me silenced by its gag contract, and therefore unable to respond to correct the lies. I have asked Scientology to correct the lies submitted to the IRS and it has refused.

Scientology's IRS tax exemption is based on lies, not just

about me, but about other individuals, and about the organization's practices and intentions. The IRS was derelict in its duty to investigate the truth or falsity of Scientology's submissions. The US was derelict in its duty in granting Scientology's tax exempt status, protecting it, and supporting it in its global goals. By aligning itself with Scientology the US turned its back on its citizens who have been victimized by the organization, and who are really the people the US should protect and support. When I realized that Scientology's leaders consider that their tax exempt billions depend on silencing me, and that the US courts and government had formed an unholy alliance with the organization, I left for Canada.

Scientology claims to be a religion, and claims all the extraordinary benefits conferred by the Constitution on religions. It claims that it is organized solely for religious purposes and that its policies and bulletins, even its intelligence training instructions and its "fair game" policy, are "scriptures." It claims that people and countries opposing its antisocial goals and practices and civil rights abuses are engaging in "religious persecution."

It is axiomatic that there is no freedom of religion where there is no freedom to criticize, oppose or reform religion. The US was founded in great part by people fleeing "religious persecution" for opposing, criticizing or seeking to reform a religion, which had the power, often provided by the State, to persecute them. The US recognized the need for its citizens to be free from religious persecution in the Religious Expression and Religious Establishment Clauses of the First Amendment.

The prohibition against the State's establishment of a religion has traditionally been interpreted to mean that no religion will be favored or given more support by government than any other religion. Christianity and Christians, Buddhism and Buddhists, and Scientology and Scientologists will be treated by government and all its branches in every way equally. Also anti-christians, anti-buddhists and anti-scientologists will be treated in every way equally.

Scientology, with its fair game attacks, black PR, gag contracts, and aggressive litigation, is attempting to suppress and eliminate criticism, as well as opposition and reformation efforts. The US courts' enforcement of its gag contracts necessarily involves the State in this one "religion's" suppression and elimination of criticism. Judicial enforcement also results in the promotion and establishment of Scientology by the removal of opposition to its promotion and establishment. Unless the State is also willing to become involved in and support every other religion's suppression or elimination of criticism, its judicial assistance to Scientology in its campaign

is favoritism, and impermissible. It is a tragedy for all that the US favors the most abusive and irreligious of its "religions."

It is inconceivable that any US Court would prosecute someone who under any circumstances signed a contract which required that he not discuss God, Jesus Christ, the Holy Bible, or his experiences in the Christian religion; or for that matter Allah, Islam, Mohammed, the Koran, the Vedas or Krishna. It therefore must not do so at the insistence of Scientology. It is inconceivable that a Christian church in the US would do what Scientology has done to silence its critics. But even Christianity, although it would never silence anyone about itself, must not be given the opportunity. Therefore Scientology's efforts to silence its critics and prevent discussion of itself must not be given judicial support.

My case is not unique. There are hundreds, if not thousands, of Scientologists and ex-Scientologists in the US who are bound by this organization's contracts of silence. For this reason alone the statements of Scientology's spokespeople cannot and should not be believed. Those who would speak the truth have been shuddered by "contract" and threat into silence. I just happen to be one of the few who have chosen, despite the threats and attacks using the power of the US courts, to speak up. Mine is a test case for all the people Scientology binds in silence. What the US does in my case will spell either freedom or continued persecution for those many fearful silent people.

In the US, Constitutionally guaranteed Freedom of Religion has come to mean freedom for the religious corporation and its leaders to persecute the practitioners, as well as the critics, of the religion. This is a perversion of Freedom, worked by clever lawyers being paid by the persecutors. It must be changed, and true Freedom of Religion reinstituted. The US is the only western country in which people can be jailed for mentioning a religion - Scientology. Certainly Germany does not jail people for mentioning any religion, or even Scientology.

Regarding Scientology, and any religion, at least these things must be ordered and implemented before it should be granted the benefits of religious status, and before the US champions its cause:

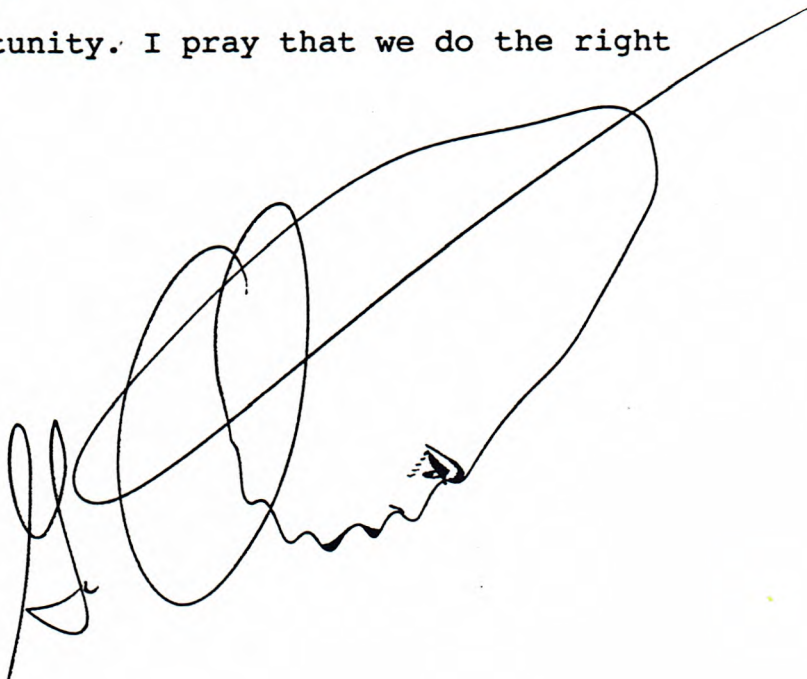
1. Any member of any religion must be free to leave at any time without persecution for choosing to leave, and may not be detained for any amount of time;
2. Any member of any religion must be free to speak or write freely his or her experiences within that religion, and may not be persecuted for doing so;

3. Scientology must take steps to demonstrably insure that the practice of using information divulged by people during their association with the organization against those people in any way not for their welfare is forever stopped;

4. Scientology must reform pursuant to civil rights statutes, or abolish, its RPFs.

Thank you for this opportunity. I pray that we do the right thing.

Gerry Armstrong
C/O George W. Abbott, Esquire
2245-B Meridian Boulevard
P.O. Box 98
Minden, Nevada 89423-0098
(702)782-2302

A large, stylized handwritten signature in black ink, likely belonging to Gerry Armstrong. The signature is composed of several large, overlapping loops and a long, sweeping horizontal stroke that extends towards the right edge of the page.

22

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<http://thomas.loc.gov/r105/r105d09no7.html>

Suspension Failed--Minority Religious Groups Re German Government: The House failed to suspend the rules and agree to H. Con. Res. 22, amended, expressing the sense of the Congress with respect to the discrimination by the German Government against members of minority religious groups, particularly the continued and increasing discrimination by the German Government against performers, entertainers, and other artists from the United States associated with Scientology by a yea and nay vote of 101 yeas to 318 nays, Roll No. 625.

Pages H10509-24, H10528

House of Representatives - November 09, 1997

Res. 22 concerning German discrimination against individuals holding minority religions or beliefs, I noted that the German Federal Minister for Foreign Affairs, Klaus Kinkel, has reportedly said that the German Ambassador to the United States, Ju AE4rgen Chrobog, has offered to explain the German position to Congress, but '. . . he has had no chance to do this.' ('Kinkel Rejects American Critique: 'No Persecution of Religious Minorities in Germany,' in the Frankfurter Allgemeine Zeitung (National), November 3, 1997.) This assertion is false.

I have attached for your information a copy of a letter of invitation sent to Ambassador Chrobog on August 25, 1997. The relevant portion of the letter reads as follows: 'I write today to invite a representative of the Federal Republic of Germany to testify at a public hearing of the Commission to be held at 10:00 a.m. on Thursday, September 18, 1997, in room SDG-50 of the Dirksen Senate Office Building. The subject of the hearing will be 'Emerging Intolerance in the Federal Republic of Germany.' It will focus on official policies and actions directed at members of minority ethnic groups and minority religions and beliefs contrary to the Federal Republic's international obligations.'

Commission staff engaged in repeated telephonic conversations with officials at the Embassy of the Federal Republic of Germany to ascertain whether the German government would provide a witness at the hearing. At no time did any German official indicate that a witness would be provided.

After reviewing the problem of religious intolerance, I decided to broaden the scope of the hearing and accordingly changed its title to 'Religious Intolerance in Europe Today,' so that the Commission could better address the Europe-wide nature of the problem. On September 9, 1997 my Chief of Staff sent Ambassador Chrobog's deputy, Mr. Thomas Matussek, a note explaining the change in scope and indicating that no official German witness was needed.

On September 16, 1997, Ambassador Chrobog wrote to the Commission saying that '. . . an official representative of Germany cannot, on principle, testify before the Commission.' Since the Commission is an independent agency of the United States government, duly authorized by law, a clarification of the principle invoked by Ambassador Chrobog would be in order to determine if it would be possible for an official of the Federal Republic of Germany to speak on the record in public before any U.S. government body.

The Ambassador's letter enclosed a background paper outlining the German government's official position on the subject. By telephone, the Embassy asked that this paper be made available to Commissioners. I agreed to do that and copies of the Ambassador's letter and attached information were placed on the dais at the hearing for the use of Commissioners.

In addition, the German Embassy requested that the paper enclosed with the Ambassador's letter be included in the hearing record. I have also agreed to do that. When the hearing record is published, it will contain all of the documents I have attached to this letter.

I provide you with this detailed record of the Commission's interactions with the Federal Republic of Germany's official representatives so that you may accurately respond to the allegation that official German views have not had the opportunity to be presented to the House or Senate on this subject. The opportunity was offered, and, unlike the ambassadors and official representatives of candidate NATO member states who appeared, testified, and responded to questions at Commission hearings on that subject during the spring of 1997, the German position was that they would not provide a witness. I have responded positively to their request that their written views be made available. In addition, staff level contacts have continued as the Commission seeks information.

Without attempting to discuss all of the problems in the official German position on this issue, I want to highlight the fact that Principle VII of the Final Act of the Conference on Security and Cooperation in Europe (the 'Helsinki Accords,' to which the Federal Republic of Germany is a party), provides, in pertinent part, that '. . . the participating States will recognize and respect the freedom of the individual to profess and practice, alone or in community with others, religion or belief acting in accordance with the dictates of his own conscience.' The repeatedly asserted official German position that Scientology is not a 'religion' does not meet Germany's international human rights obligations. Whether or not Scientology is a religion is irrelevant in this case, because 'belief' is a broader term than 'religion,' and Germany's official policy toward Scientology ignores the fact that 'belief' is a protected category under the Helsinki Accords. Note that Principle VII is phrased in the disjunctive, religion or belief,

and that Germany's policy toward Scientology is, we believe, in violation of this critically important principle.

Whether or not Scientology is a religion is irrelevant in this case, because 'belief' is a broader term than 'religion,' and Germany's official policy toward Scientology ignores the fact that 'belief' is a protected category under the Helsinki Accords. Note that Principle VII is phrased in the disjunctive, religion or belief, and that Germany's policy toward Scientology is, we believe, in violation of this critically important principle.

I appreciate this opportunity to assist you in dealing with this matter, and look forward to continuing to work with you on issues of mutual concern.

Sincerely,

Alfonse D'Amato, U.S.S.,
Chairman.
COMMISSION ON SECURITY
and Cooperation in Europe,
August 25, 1997.
His Excellency Ju AE4rgen Chrobog,
Ambassador,
Embassy of the Federal Republic of Germany,
Washington, DC.

Dear Mr. Ambassador:

I write today to invite a representative of the Federal Republic of Germany to testify at a public hearing of the Commission to be held at 10:00 am on Thursday, September 18, 1997, in room SDG-50 of the Dirksen Senate Office Building. The subject of the hearing will be 'Emerging Intolerance in the Federal Republic of Germany.' It will focus on official policies and actions directed at members of minority ethnic groups and minority religions and beliefs contrary to the Federal Republic's international obligations.

The Commission is also inviting an official witness from the Executive Branch to present the official United States position on these matters as reflected in the Department of State's 'Country Reports on Human Rights Practices for 1996,' and other official statements.

While detailed plans for the hearing's organization are not yet final, I anticipate having three panels of witnesses; a first panel of official witnesses; a second panel of non-governmental organization and academic experts; and a third panel of publicly prominent Scientologists who have had experience with German policies on the Church of Scientology and its adherents. The third panel is occasioned in particular because of the Council of Ministers' decision to place the Church of Scientology 'under observation' by the Federal Office for the Protection of the

Constitution and coordinate state bodies.

I appreciate your kind attention to this request and express the hope that you or someone else who can speak with authority and credibility on Germany's approach to these problems can testify to present the Federal Republic's official position with the accuracy and clarity it deserves.

In order to help Members prepare for the hearing, the Commission requests that you provide 75 copies of your written testimony at least one day prior to the hearing. Oral presentations should be approximately 7-10 minutes in length. If your desire, you may provide additional written material for inclusion in the hearing record.

I look forward to working with you on this and other issues of common concern.

Sincerely,

Alfonse D'Amato, U.S.S.,
Chairman.

THE AMBASSADOR OF THE
Federal Republic of Germany,
September 16, 1997.
Senator Alfonse D'Amato,
Chairman, Commission on Security and Cooperation in Europe,
Washington, DC.

[Page: H10512]

Dear Senator D'Amato:

Thank you very much for your letter dated August 25, inviting a representative of the Federal Republic of Germany to testify at the public hearing 'Emerging Intolerance in the Federal Republic of Germany,' to be held by the Commission on Security and Cooperation in Europe on September 18. I am also aware that my deputy, Mr. Thomas Matussek, has received a letter, dated September 9, from Mr. Hathaway, Chief of Staff of the Commission on Security and Cooperation in Europe, explaining that the scope of the hearing has now been changed.

In the meantime, I enclose a background paper outlining the German position on the Scientology organization. The Commission staff has already been supplied with a copy.

Sincerely,

Juergen Chrobog

SCIENTOLOGY AND GERMANY

4.

Since October 1996 the Church of Scientology has waged an aggressive campaign against Germany. Using full-page ads in the New York Times and the Washington Post, the Scientology organization has compared the treatment of Scientologists in present-day Germany with that of the Jews under the Nazi regime. This is not only a distortion of the facts, but also an insult to the victims of the Holocaust. Officials in Germany and the U.S. have repeatedly spoken out against this blatant misuse of the Holocaust. Ignatz Bubis, Germany's top Jewish leader, denounced the comparison as 'false' and most recently, State Department spokesman Nicholas Burns at a press briefing on June 6, 1997 said:

'Germany needs to be protected, the German Government and the German leadership need to be protected from this wild charge made by the Church of Scientology in the U.S. that somehow the treatment of Scientology in Germany can or should be compared to the treatment of Jews who had to live, and who ultimately perished, under Nazi rule in the 1930s. This wildly inaccurate comparison is most unfair to Chancellor Kohl and to his government and to regional governments and city governments throughout Germany. It has been made consistently by supporters of Scientology here in the United States, and by Scientologists themselves. I do want to disassociate the U.S. Government from this campaign. We reject this campaign. It is most unfair to Germany and to Germans in general'.

After having conducted thorough studies on the Scientology organization, the Federal Government has come to the conclusion that the organization's pseudo-scientific courses can seriously jeopardize individuals' mental and physical health and that it exploits its members. Expert testimony and credible reports have confirmed that membership can lead to psychological and physical dependency, to financial ruin and even to suicide.

In addition, there are indications that Scientology poses a threat to Germany's basic political principles.

Because of its experiences during the Nazi regime, Germany feels a special responsibility to monitor the development of any extreme group within its borders. German society is particularly alert towards radicalism of any kind and has set stiff standards for itself when dealing with aggressive, extreme groups--even when the groups are small in number.

Every citizen in Germany has the right to challenge the legality of government decisions which affect him or her, in an independent court. The Scientology organization has made ample use of its right to go to court in Germany and will continue to do so. Up until now, no court has found that the basic and human rights of Scientology members have been violated.

IS SCIENTOLOGY A THREAT?

According to a decision of March 22, 1995, by the Federal Labor Court, Scientology utilizes 'inhuman and totalitarian practices.' Often members are separated from their families and friends. The organization is structured so as to make the individual psychologically and financially dependent on a Scientology system. There are cases of the Scientology organization using this system of control and assertion of absolute authority to exercise undue influence in certain economic sectors--particularly in personnel and management training--causing serious harm to some individuals.

In response to the growing number of letters from concerned parents and family members, particularly from those with relatives in Scientology, the German Parliament (Bundestag) established an investigative commission which will present a report on the activities of 'sects and psycho-cults' in the course of the year 1997.

Among the findings . . . were these: Scientology's lawyers hired private investigators to dig into the private lives of IRS officials and to conduct surveillance operations to uncover potential vulnerabilities.' In 1994, the U.S. Supreme Court upheld a California court's finding of substantial evidence that Scientology practices took place in a coercive environment and rejected Scientology's claims that the practices were protected under religious freedom guaranties.

In other countries, too, the Scientology organization is increasingly seen with great concern. In France, a government commission led by Prime Minister Juppe, and charged with monitoring the activities of sects, convened its first meeting in mid-November 1996. On November 22, 1996, in Lyon, several leading Scientologists were found guilty of involuntary manslaughter and fraud in a case where methods taught by Scientology were found to have driven a person to suicide.

In Italy during December 1996, an Italian court ordered jail terms for 29 Scientologists found guilty of 'criminal association.'

In Greece, a judge declared in January 1997 that an Athens Scientology group was illegal after ruling that the group had used false pretenses to obtain an operating license.

IS SCIENTOLOGY A BONA-FIDE RELIGION?

In its ads and writings, the Scientology organization claims it is internationally recognized as a religion, except in Germany. This is false.

Among the countries that do not consider Scientology a religion are Belgium, France, Germany, Great Britain, Ireland, Italy, Luxembourg, and Spain, as well as Israel and Mexico.

In the United States, the Scientology organization did in fact receive tax-exempt status as a religious congregation in 1993--after a decades-long, contentious battle with the IRS.

In Germany, it is possible for organizations undertaking non-profit activities to be exempt from taxation. Up until now, attempts by the Scientology organization to obtain such status have failed. Two of the highest German courts recently dealt with cases involving the Scientology organization. The Federal Labor Court (Bundesarbeitsgericht) in its above mentioned decision on March 22, 1995, also ruled, that the Scientology branch in Hamburg was not a religious congregation, but clearly a commercial enterprise. In its decision, the court quotes one of L. Ron Hubbard's instructions 'make money, make more money--make other people produce so as to make money' and concludes that Scientology purports to be a 'church' merely as a cover to pursue its economic interests.

The Federal Administrative Court (Bundesverwaltungsgericht) confirmed decisions by lower administrative courts that the Scientology organization has to register its economic activities as a business with the relevant authorities (decision of February 16, 1995).

Also in France, the Scientology organization is neither a religion nor a non-profit institution. The organization's Paris head office was closed in early 1996 for not paying back taxes.

In Great Britain, the Scientology organization has been rebuffed repeatedly by the Charity Commission which insisted as recently as 1995 that the organization could not be considered a religion under British law and could, therefore, not enjoy any tax-exempt status.

FEDERAL AND REGIONAL ACTION TAKEN AGAINST THE SCIENTOLOGISTS IN GERMANY

On June 6, 1997, Federal and State Ministers of the Interior agreed to place the Scientology organization under surveillance. The Ministers have established that several activities of the Scientology organization may operate contrary to democratic principles and therefore warrants a formal investigation by the Office for the Protection of the Constitution (Verfassungsschutz). The investigation will focus on the structure of the organization and not on individual members. Concrete details regarding the extent of the investigation are not available at this time, but more information will be disclosed following the investigation's first year. Referring to the investigation, Manfred Kanther, Federal Minister of the Interior, said on June 6, 1997: 'The year's surveillance will establish whether the organization is simply an unpleasant group, a criminal organization or an association with anti-constitutional aims.'

Some of the German states have taken steps to protect their citizens against Scientology:

As of November 1, 1996, all applicants for admission to Bavarian public service and Bavarian public service employees must indicate whether they belong to the Scientology organization. Membership in Scientology alone does not automatically exclude individuals from public service.

THE SCIENTOLOGY PUBLIC RELATIONS CAMPAIGN AGAINST GERMANY

The Scientology organization has financed several highly visible public relations campaigns directed against the Federal Republic of Germany in American publications. Among the papers that have carried full-page ads in the last couple of years are the New York Times, the Washington Post and the International Herald Tribune. In addition, the International Herald Tribune published a controversial open letter to German Chancellor Helmut Kohl.

The Scientology organization has also distributed pamphlets such as 'The Rise of Hatred and Violence in Germany,' reiterating its allegations.

The open letter to Chancellor Kohl, written by a Hollywood lawyer with famous Scientology clients, appeared in early 1997 in the International Herald Tribune. The letter repeated Scientology organization assertions against Germany and was signed by 34 American celebrities. 'Disgraceful and irresponsible' is how Michel Friedman, a member of the Central Council of Jews in Germany, described the letter. He added: 'It's totally off the mark. Today, we have a democracy and a state based on the rule of law.'

Following the letter, the U.S. State Department again criticized the Scientologists' public relations campaign, saying, 'we have advised the Scientology community not to run those ads because the German government is a democratic government and it governs a free people. And it is simply outrageous to compare the current Germany leadership to the Nazi-era leadership. We've told the Scientologists this, and in this sense we share the outrage of many Germans to see their government compared to the Nazis.'

ARE THE CASES IN THE ADS TRUE?

The Scientologists' repeated allegations that artists belonging to Scientology are being discriminated against in Germany are false. Freedom of artistic expression is guaranteed in Article 5(3) of the German Basic Law (Germany's Constitution), thus artists are free to perform or exhibit in Germany anywhere they please.

Jazz pianist Chick Corea performed in Germany as recently as March 24, 1996, during the 27th International Jazz Week held in Burghausen, an event which received approximately \$10,000 in

funding from the Bavarian Ministry of Culture.

'Mission Impossible,' starring Tom Cruise, was a hit in Germany, grossing \$23.6 million.

Likewise, the Scientologists' claim that a teacher who taught near the city of Hannover was fired for her beliefs is untrue. The woman was not fired, though she repeatedly violated school regulations by using the classroom to recruit students and their parents to Scientology. After multiple warnings, the woman was transferred from classroom to administrative duties to prevent further violations.

Contrary to allegations that Scientologists' children have been prevented from attending school, all children in Germany, including Scientologists', are legally required to attend school. If a Scientologist's child is not enrolled in a German school, it can only be that the parent has pulled the child out.

Mr. Speaker, I reserve the balance of my time.

Mr. BEREUTER. Mr. Speaker, I yield myself such time as I may consume and rise in strong opposition to the legislation.

(Mr. BEREUTER asked and was given permission to revise and extend his remarks.)

Mr. BEREUTER. Mr. Speaker, this legislation came to the House Committee on International Relations with very little notice. It was on the agenda one morning. We have no Europe and Middle East subcommittee, and this legislation is one more argument why we should have so that bad and defective legislation, which in my judgment this is, can be vetted by the subcommittee, reworked, or stopped at that point before it comes to the House floor.

What we do on this body does matter when it comes to statements on foreign policy. We may consider it to be a very lightly relevant issue at times. But I will tell my colleagues, across the oceans when other countries look at what we do, they take it very seriously. So we have to be very careful.

The Ambassador from Germany to the United States has weighed in with about as strong a letter as I have seen, refuting some of the arguments that have been made by proponents of the legislation. He contends he did not have an opportunity to meet with the Members who were sponsoring it. That has been argued about in the committee, as I understand it.

But I think one important point would be this: This comes down, as I understand it, to a matter of taxation with respect to what we would say in English would be the Cologne Christian community, because they, in Germany, do not consider Scientology to be a religion. Therefore, they tax it. But Germany is not

alone in that respect. So does Belgium, France, the United Kingdom, Ireland, Italy, Luxembourg, Spain, and Europe, plus Israel and Mexico. And those are just the countries that I know about.

So it seems to me to bring this legislation here aiming it at Germany, which was at first at least almost exclusively a Scientology-oriented legislation, now been broadened with an amendment to change it, I think is inappropriate. It is unbalanced. It is damaging to our relations with Germany. And there is no real cause for us to be considering this kind of legislation.

Mr. Speaker, I reserve the balance of my time.

Mr. PAYNE. Mr. Speaker, I yield myself such time as I may consume.

Mr. Speaker, as a sponsor of this bill expressing disapproval of religious discrimination by the German Government, I want to thank my colleagues on both sides of the aisle who have joined in supporting a very basic, democratic right, freedom of religion.

This bipartisan resolution was approved by the full Committee on International Relations after performing artists associated with religious minorities were denied the opportunity to perform in Germany and were also kept out of the political process. As our resolution states, the German Government is constitutionally obligated to remain neutral on religious matters, but it has violated this neutrality.

The United States, as the leader of the free world and champion of democracy around the globe, has an obligation to take a stand whenever we see basic religious rights being restricted, whether their religious affiliation is Muslim, Christian, Jewish, or any other faith. Performing artists from the United States have been denied the right to perform in Germany based on their personal spiritual beliefs.

When our citizens visit and work abroad, they should be able to live in peace without the fear of religious intolerance or mistreatment by the host government. In turn, when individuals visit the United States or decide to live here, they have a right to be able to worship freely and join any organization or group they choose to. These are good-faith gestures. Discrimination against a person because of his or her personal beliefs is always objectionable.

Congress should stand up and say that we strongly disprove of religious intolerance. Germany is a friend, has been a friend for some time, an ally of the United States, and we want that relationship to remain strong and mutually beneficial. That is why we are calling on the German Government to respect the fundamental rights of every citizen of a democracy, the right to

enjoy religious freedom.

Mr. Speaker, I reserve the balance of my time.

Mr. BEREUTER. Mr. Speaker, I yield 1 1/2 minutes to the gentleman from Virginia [Mr. Pickett.]

Mr. PICKETT. Mr. Speaker, I thank the gentleman from Nebraska [Mr. Bereuter] for yielding me the time.

I rise in strong opposition to this resolution. This resolution was acted upon without a public hearing and without a committee report and should, at the very least, be further considered by the committee. The sweeping allegations in the resolution are based upon a handful of alleged events that in no way support the allegations. This is serious business.

Germany is one of our Nation's staunchest and most dependable allies. The only purpose this resolution will serve is to create ill will and less friendly relations with a steadfast friend. America needs the full and enthusiastic support of strong and dependable nations like Germany. If it is to be successful in carrying out its mandate of world leadership, we should not be petty and elevate every issue to embarrassing confrontation.

When folks on one side of the street start throwing rocks, it is not long before folks on the other side start throwing them back. This resolution is bad for our country. I urge Members to reject it.

Mr. GILMAN. Mr. Speaker, can you tell me how much time we have consumed?

The SPEAKER pro tempore. The gentleman from New York [Mr. Gilman] has 8 1/2 minutes remaining. The gentleman from Nebraska [Mr. Bereuter] has 16 1/2 minutes remaining. The gentleman from New Jersey [Mr. Payne] has 8 minutes remaining.

Mr. GILMAN. Mr. Speaker, I yield 3 minutes to the gentleman from Arizona [Mr. Salmon], a member of our committee.

Mr. SALMON. Mr. Speaker, this is a wonderful opportunity for us to reaffirm what we stand for here in this country, whether or not we stand for the ability of Americans, wherever they live, whether it be in this country, whether it be Germany, Italy, wherever, to worship according to the dictates of their own conscience.

I have heard my colleagues say that this was not given an adequate hearing. Let me tell them that I serve on the committee dealing with security and cooperation in Eastern Europe. We had a full day of testimony and hearings regarding incident after incident of persecution in Germany of minority religions.

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I have heard it also referred to as the Scientology bill. Let me tell my colleagues, Mr. Speaker, it is much broader than that. I had folks from the Jehovah's Witness religion, folks from other Christian religions, Muslims, come into my office and tell me some of the horrors that they have had to endure regarding religious persecution in Germany. It is much more than just a taxation issue.

When we talk about American citizens being blacklisted or blackballed and boycotted simply because of their religion, not allowed to go abroad and perform simply because of their religious persuasion, that is something that ought to give us great concern. Furthermore, I have heard some of my colleagues on this floor in a whisper, I do not think anybody wants to go forth publicly and say anything this ludicrous, but I have heard some Members say behind the scenes, 'Wait a minute, this is Scientology, they aren't Christian, or they aren't one of the mainstream religions.' I doubt anybody would say something that foolish in the light of day because frankly, Mr. Speaker, that is what this country began about, it was about religious freedom, religious tolerance. That is why a band of people came to this country initially, so that they could flee religious persecution. If we do not stand for the protection of that, regardless of whether or not it is a minority religion, then we stand for nothing. Let me also point out that virtually every religion, yes, even Christianity, which I am proud to be a believer in, started as a minority religion.

From that time on, people were persecuted for their beliefs. Whether they are killed, whether they are blackballed, whether they are thrown out of the country, whatever persecution exists, we have a responsibility in our Government to stand up and be counted. If we cannot do that, if we cannot speak harshly to our allies who are our friends, if we cannot be plain spoken and honest with them, how can we be plain spoken and honest with our enemies?

Last week we debated 8 bills decrying China for its violations on human rights. I have heard some say that, 'Gosh, we didn't have any officials from Germany come and testify before our committee. Therefore, how can we give this serious credence?' I have served on the Committee on International Relations for 3 years and I do not recall a public official from any of the governments that we have done resolutions on ever coming in and testifying before that committee.

Frankly, this is all a smoke screen. Let us stand up and be counted. Let us stand for what we profess to believe in, that is, religious tolerance.

Mr. BEREUTER. Mr. Speaker, just for clarification I would indicate that the Committee on International Relations did not have hearings on this. The Helsinki Commission organization in this body did, but not the Committee on International Relations.

Mr. Speaker, I yield 2 1/2 minutes to the gentleman from California [Mr. Campbell], a member of the committee.

(Mr. CAMPBELL asked and was given permission to revise and extend his remarks.)

Mr. CAMPBELL. Mr. Speaker, how quick we are to condemn and how quick we are to neglect the advice of scripture to be sure about what may be in our own eye before we go and criticize what we find in another's. But this is particularly difficult when the criticism is against a friend and when we have not given that friend the opportunity to be heard.

Let me be very explicit. We, the House of Representatives, the Committee on International Relations, has not given Germany the opportunity to be heard. There is an allegation that Senator D'Amato might have invited German witnesses, they might have refused. I understand that is a give and take in that particular context. I understand that at one point Senator D'Amato's chief of staff said that a German witness was not going to be needed after all. But the point about our committee and our House is that we are today condemning a friend, an ally of the United States and we have not had the common courtesy to ask Germany to send a representative to our committee to answer the charges. That is no way to treat a friend and ally.

These are very strong charges. Let me quote from the resolution. We believe that Germany has 'fostered an atmosphere of intolerance toward certain minority religious groups.'

Given the history of Germany, these are very painful words. These are words that we should not be saying lightly. Yet we do without having heard from our friends. We claim that the German Government has engaged in discrimination and we use the word several times in the resolution.

First of all, the pain and the process are emphasized in my remarks, the pain that we inflict on a friend and the imprecision of the process. But note as well that this really does not deal with the high concerns that the sponsors wish to suggest. It seems to concern itself at least as much with tax-exempt status in Germany, as to which we would not welcome German interference in our country.

I conclude by saying this: To the German Government and to our friends around the world who watch what we do today, please understand this is not the overwhelming majority. Understand what we do today in the final minutes of a session coming to a conclusion is not the thoughtful expression of a majority of this House, in my view. It was a voice vote in the committee. It will probably be a voice vote again. Please note that we are not addressing you in the terms that this resolution appears to say, that we are better friends than that.

Mr. PAYNE. Mr. Speaker, I yield 3 minutes to the gentleman from California [Mr. Becerra].

(Mr. BECERRA asked and was given permission to revise and extend his remarks.)

Mr. BECERRA. Mr. Speaker, I thank the gentleman from New Jersey for yielding me this time.

Mr. Speaker, House Concurrent Resolution 22 is about preserving religious freedom, plain and simple. I learned the depth of this problem when I was introduced to the hardships faced by scientologists in Germany. Early in my congressional career about 5 years ago, I met with Chick Corea the renowned jazz pianist and learned that he had been barred from public performances in Germany. He was set to go, he had performances all lined up. All of a sudden he was not granted a visa to go into Germany even though most of his performances had already been for the most part sold out. At the time I was able to work with a number of my colleagues and we put letters together and sent them off to the German government protesting such actions.

Back in 1941, President Franklin D. Roosevelt said in the future days which we seek to make secure, we look forward to a world founded upon 4 essential human freedoms. Those freedoms he listed were freedom of speech, of expression, of being free from want, and freedom from fear. He also told us of the freedom of every person to worship God in his own way everywhere in the world. I mention that because just yesterday, if Members read the New York Times, there was an article that said a Federal immigration court judge in Tampa, Florida, granted asylum to a German citizen who was a member of the Church of Scientology. Her asylum claim was based on the fact that she would be subjected to religious persecution had she returned to Germany.

Many of my constituents, as I suspect many of your constituents, are members of religious minority groups like the Church of Scientology. This resolution calls for protecting their rights if and when they spend time in Germany. They deserve this protection. German citizens themselves who are members of minority religious groups deserve religious freedom as well.

As Members cast their vote on House Concurrent Resolution 22, remember the words of President Roosevelt listing religious freedom as one of the four essential human freedoms. As he said, freedom of every person to worship God in his own way everywhere in the world. Today is one of those future days that President Roosevelt spoke of. Today we should be standing together to say aye to House Concurrent Resolution 22.

[Page: H10515]

Mr. BEREUTER. Mr. Speaker, I yield 1 minute to the gentleman from New York [Mr. Houghton], a member of the committee.

(Mr. HOUGHTON asked and was given permission to revise and extend his remarks.)

Mr. HOUGHTON. Mr. Speaker, I feel very uncomfortable supporting this measure. I do not know whether the actions of the German Government in relationship to the Church of Scientology are right or wrong. I have a sense, and this is probably presumptuous for me to say, had I been given the decision to make, I might have made it a little differently. But that is not the issue. The issue is whether we do not look just a bit pompous sitting back here with all our many moral problems in this country, to pass judgment on a nation, our friend, which is wrestling with something which we ourselves and other nations of this world are wrestling with. This is not a Martin Niemoller issue. Please let us withhold judgment. I would not support this measure.

Mr. GILMAN. Mr. Speaker, I yield 1 minute to the gentleman from Illinois [Mr. Weller].

(Mr. WELLER asked and was given permission to revise and extend his remarks.)

Mr. WELLER. Mr. Speaker, I rise in support of this resolution, as amended, and ask for bipartisan support. This issue is something pretty basic for all Americans, about basic American principles and values of freedom and religion. I think we all wonder sometimes and think back to why the Founding Fathers and Mothers came to our Nation. One of the reasons was and is because we practice tolerance and freedom of religion, and they came here, our ancestors, to avoid religious persecution. It is a pretty basic value for all of us. Germany is our ally. It is a first world country. It should be leading the way in religious tolerance. But unfortunately, American citizens today are being denied the ability to do business in Germany because of their religious faith. Whether Members agree with the values and the teachings of Islam, or Jehovah's Witnesses, or Charismatic Christians or the Church of Scientology, these individuals are being persecuted today. That is why this resolution is important. The President should be discussing this issue because he should be speaking in behalf of Americans who are suffering persecution. Congress must speak. I ask for bipartisan support. I urge a 'yes' vote.

Mr. BEREUTER. Mr. Speaker, I yield 2 minutes to the gentleman from West Virginia [Mr. Wise].

Mr. WISE. Mr. Speaker, I rise in strong opposition to this resolution. If there is discrimination then it should be pointed out, but it should be pointed out in all the places it might occur. But here efforts are being made to single out Germany. I rise in opposition because there are differing views about some of the specific allegations. One of the performers that has been

mentioned here has played in Germany as recently as last year at a function that received funding from the State of Bavaria. The movies that have supposedly been boycotted indeed have been shown and have been hits in Germany, financial successes.

I rise in opposition because if we are talking about the Church of Scientology. Our own country did not grant tax-exempt status to that church until 1993. Indeed, there is a long list of nations, Belgium, France, Germany, Great Britain, Ireland, Israel, Italy, Luxembourg, Mexico, Spain that presently decline to grant that same status.

I rise in opposition because France, Italy, and Greece recently have taken actions which could be considered as discrimination in the sense they had made rulings against this Church of Scientology, and yet this resolution does not mention them.

Finally, because in a statement by Michael Friedman of the Central Council of Jews in Germany, responding to many of the charges made, he writes, 'They are totally off the mark. Today we have a democracy in Germany and a state based on rule of law.'

The sponsors have heightened awareness about alleged discrimination in many places, but let us not single out an ally with relatively unsubstantiated charges. Instead, let us engage and talk to each other as the true friends we are. There are American men and women in Bosnia today side by side with German men and women holding up an important part of our European responsibilities. Germany works with us in so many different ways. Let us recognize that and vote this resolution down, at the same time urging that discrimination everywhere be pointed out and that we deal with it together.

Mr. PAYNE. Mr. Speaker, I yield such time as she may consume to the gentlewoman from Texas [Ms. Jackson-Lee].

(Ms. JACKSON-LEE of Texas asked and was given permission to revise and extend her remarks.)

Ms. JACKSON-LEE of Texas. Mr. Speaker, I rise in strong support for religious freedom and ask my colleagues to support House Concurrent Resolution 22.

Mr. Speaker, I rise in support of House Concurrent Resolution 22, which declares that the Congress holds Germany responsible for protecting the rights of United States citizens who are living, doing business, or traveling in Germany and deplores the actions of certain government officials in Germany which have fostered an atmosphere of intolerance toward certain minority religious groups.

This country was founded on the principles of freedom of religion, and in over 200 years of history we have not only

survived but thrived. This resolutions calls for the President to assert the concern of the United States Government against such discrimination; to emphasize that the United States regards the human rights practices of the German Government as a significant factor in the relationship between the two countries; and to encourage other governments to appeal to the Government of Germany in efforts to protect the rights of foreign citizens and members of minority religious groups in Germany.

Germany is a signatory to the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the Helsinki accords, and is therefore obliged to refrain from religious discrimination and to foster a climate of tolerance.

It is important for the Congress to make its views known with regards to human rights by our adversaries, but especially by our allies. Religious freedom should be a basic right of all people regardless of their faith or nationality.

I would hope that the people of Germany will take note of the peaceful diverse religious community that exists here in this country and would reframe from discouraging religious diversity in their own nation.

I urge my colleagues to join me in support of this resolution. Thank you.

Mr. PAYNE. Mr. Speaker, I yield 1 minute to the gentleman from Arizona [Mr. Pastor].

(Mr. PASTOR asked and was given permission to revise and extend his remarks.)

Mr. PASTOR. Mr. Speaker, when I first came to this Congress in October of 1991, I was approached about trying to do something with this issue. I have to tell Members since then to today, things have gotten worse for the people not only who are in Germany but also for the Americans that travel to Germany.

Mr. Speaker, the issue is, if you are for human rights, you should be for this resolution. If you are against religious persecution, you should be for this resolution. If you are against the persecution of Christians in China, you should be for this resolution. Mr. Speaker, there is concern for many of us in this country and we are supporting this resolution in a bilingual nature, because we want to show our concern that we do not want history to repeat itself in Germany.

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Mr. PAYNE. Mr. Speaker, I yield the balance of my time to the gentleman from New York [Mr. Gilman].

Mr. GILMAN. I thank the gentleman for yielding me the time.

Mr. Speaker, how much time do we have remaining?

The SPEAKER pro tempore (Mr. Latham). The gentleman from New York [Mr. Gilman] has 9 minutes remaining and the gentleman from Nebraska [Mr. Bereuter] has 11 minutes remaining.

Mr. BEREUTER. Mr. Speaker, I yield 2 minutes to the gentleman from Virginia [Mr. Wolf].

(Mr. WOLF asked and was given permission to revise and extend his remarks.)

Mr. WOLF. Mr. Speaker, I am troubled and puzzled and disappointed that the House tonight has decided to take up this resolution with regard to the Church of Scientology in Germany when the House has decided not to bring up the Freedom from Religious Persecution Act, a bill that I sponsored along with 96 other Members of the House. While we are debating this resolution tonight, millions of Christians in Tibet, Buddhists in Tibet, Buddhists, Ahmadis in other countries, the Baha'is in Iran, Muslims in China and people of other faith are being brutalized, killed, raped, tortured and maimed because of their beliefs, and yet the House does not deal with this issue and they deal with this issue with regard to this resolution.

[TIME: 1800]

There is real life slavery. In Sudan tonight they are going into slave markets and taking people out, and the House does not deal with that issue, but yet it deals with this issue.
<p>In Egypt Coptic Christians are being persecuted today as we now speak. The House does not deal with that issue, but it deals with this issue.

In closing, I am troubled and puzzled and very disappointed. If we are going to take up this resolution tonight, we basically are saying these other issues should be taken care of, and they are not being taken care of.

Mr. Speaker, I am troubled and disappointed that the House of Representatives has decided to take up the resolution on the Scientologists in Germany when the House has decided not to bring up the Freedom from Religious Persecution Act, a bill I sponsored with Senator Arlen Specter.

The Freedom from Religious Persecution Act has over 96 bipartisan cosponsors and deals with persecution against people of all faiths in all countries around the world.

While we are debating this resolution today, millions of Christians, Tibetan Buddhists, Ahmadis, Bahai's, Muslims and other people of faith are being brutalized--killed, raped,

tortured, and maimed--because of their religious belief and practice. Why won't the House speak out for them in this first session of the 105th Congress.

In China, Catholic bishops and priests are in jail and being tortured. Protestant pastors and laypeople are in jail and being tortured. Tibetan Buddhist monks and nuns are in jail and being tortured and killed. In Xinjiang Province in Northwest China, Muslim Uighurs are being persecuted.

In Sudan, 1.2 million people from the South, who are predominately Christians and animists, have died in the decade-old conflict. There is crucifixion taking place in the Nuba Mountains. Christian women and children are kidnapped and sold into slavery.

I have submitted for the record excerpts from a recent trip report of Christian Solidarity International, an international humanitarian organization with vast experience in Sudan. On their recent trip, CSI representative talked to dozens of women and children and heard of their ordeal. They talked with slave traders and visited slave markets.

One woman, a 20-year old mother, told of her ordeal when she was enslaved in May, 1997. She told CSI "I was sitting in my compound early in the morning when armed men on horseback surrounded my home. they came without warning. I did not try to run away because there was no escape. One of the raiders lashed me and took me away with my child. As we left, I could see the raiders looting everything I owned, and setting my home on fire. I was taken to another village for some hours and was then forced to carry sorghum on my head. When I could walk no further, my captor, took my child and tied her on a horse. [My captor] often insulted me, calling me 'slave' and he would beat me with a stick. He accused me of being lazy and refusing to obey orders. He used me as a concubine."

Real life slavery of Christians in Sudan. 1.2 million people have died. But the House of Representatives will not speak out for them today. In Egypt, Coptic Christians are killed, forced to pay 'protection money' to local thugs, harassed and sometimes imprisoned.

In Pakistan, Christian villages have been burned, devastating the lives of tens of thousands. Ahmadi Muslims are being persecuted.

In Vietnam, Christians and Buddhists are being persecuted.

And there are many other examples around the world. Why will this Congress not take up the Freedom from Religious Persecution Act--a bill that would cut off foreign aid to governments that kill, rape, torture, enslave or engage in other gross acts of violence against religious believers. We should speak out for

these religious believers today.

There was a promise by the speaker to 40 religious leaders in August that the bill would be a 'must do' item. He said 'this is one of the top priorities of this Republican Congress.'

Why take up this resolution to help Scientologists in Germany, but not bring up a bill that would help millions of people of faith in dozens of other countries around the world?

The Freedom from Religious Persecution Act is supported by the groups representing the vast majority of America's religious believers. It is supported by the Southern Baptist Convention, the National Association of Evangelicals, the Union of American Hebrew Congregations, the U.S. Catholic Bishop's Conference and the International Campaign for Tibet among others.

It is also supported by the American Coptic Association, the Assyrian National Congress, the Catholic Alliance, Christian Coalition, Evangelicals for Social Action, Family Research Council, Iranian Christians International, National Jewish Coalition, Union of American Hebrew Congregations, Pakistani-American Christian Association, World Lebanese Organization, World Maronite Union-USA, and the South Sudan Community of the U.S.

In May, over 90 religious leaders wrote to House leadership endorsing the measure and I submit that letter in the record. I also submit recent letters from the U.S. Catholic Bishops Conference and Rabbi David Saperstein, Director of the Religious Action Center for Reform Judaism in support of the bill.

[Page: H10522]

Dear Mr. Chairman:

On behalf of the Union of American Hebrew Congregations and the Central Conference of American Rabbis, which represent 1.5 million Reform Jews and 1,800 Reform rabbis in North America, I write to express support for the Freedom From Religious Persecution Act of 1997 (H.R. 2431).

We have been horrified by stories of religious minorities suffering brutal persecution at the hands of governments and local authorities. Tibetans are ruthlessly punished by the Chinese for simply owning a picture of their spiritual leader, the Dalai Lama; the Islamic government in Sudan commits atrocities against its Christian population including torture, rape and murder; and in Egypt, the Coptic Christian minority has been the target of Islamic fundamentalist violence. We cannot turn our back against innocent people whose sole 'crime' is the expression of their deepest religious beliefs. Having so often been the victim of persecution, it is our duty and obligation as

part of the Jewish community to not only speak out against the persecution of other religious groups around the world, but to take affirmative steps to prevent such persecution in the future.

As committed as we are to combating religious persecution, the legislation as it was originally introduced was problematic for us. We appreciate your willingness to work with us in responding to our concerns regarding the legislation, and we are pleased that we are now able to support the bill. The current version of the bill addresses our most pressing issues by: broadening the religious persecution definition to include all religious groups; moving the monitoring office from the White House to the State Department; providing a presidential waiver for sanctions when they would endanger the persecuted group; exempting humanitarian and development aid; and tightening the sanctions language to limit the export ban. (We understand that additional changes in the refugee section may be proposed, either in advance of the markup or by amendment at the markup itself, and we may be supportive of those provisions as well.)

We look forward to working with you for the swift enactment of this legislation

Sincerely,

Rabbi David Saperstein,
Director.

Mr. BEREUTER. Mr. Speaker, I yield 2 minutes to the gentleman from Missouri [Mr. Blunt], a member of the committee.

Mr. BLUNT. Mr. Speaker, I thank the gentleman for yielding this time to me. I rise in opposition to the bill, and I do that reluctantly because of my great respect for the chairman, but I think it would be wrong to pass this legislation through this House and to do it in this atmosphere. We need more time to look at this.

But more importantly, I would like to refer back to my colleague from Virginia's [Mr. Wolf] comments. There is surely religious persecution in the world today. This may even be part of it. But to pass this legislation to single out this kind of religious persecution in the face of what we know is happening all over the world turns our back on people who are in prison tonight, turns our back on people who are in slave camps tonight, turns our back on people whose lives have been given up over the issue of taxation.

Now it could very well be, Mr. Speaker, that we should get to taxation as an issue we are concerned about, but we should not address that first. We should not address that at the expense of these other issues. We need to look at persecution, we need to look at it realistically, we need to look at it all over the world, and we need to address those cases first that are worse,

not those cases that are about whether somebody is allowed to perform in a tax-exempt atmosphere or not, whether somebody's movie is boycotted in another country or not, boycotting would seem to me to be a pretty specific freedom of speech right that we would defend in America, or whether or not somebody pays taxes as a church in another country or not before we deal with people whose lives are in danger all over the world, people in Sudan, Buddhists in Tibet, Christians in Shanghai. We need to deal with those issues first.

I urge my colleagues not to vote for this resolution.

Mr. GILMAN. Mr. Speaker, I yield 2 minutes to the gentleman from Arizona [Mr. Salmon].

Mr. SALMON. Mr. Speaker, I really respect the folks that have gotten up to speak in opposition. I believe that they believe very strongly in their position, and we cannot criticize somebody for speaking their beliefs. That is what this is all about. But I am flabbergasted at those who might suggest that since there is other persecution, religious persecution, going on in the world that we should not start with this.

Mr. Speaker, frankly I am pretty appalled to hear that kind of language because there is religious persecution going on in the world, and we have to start somewhere. Here we have an opportunity to stand up and reaffirm what this country is all about, and I am very, very dismayed that some have picked up on this taxation comment. This is simply a sense of Congress. It was one of the examples used of many.

We are not asking Germany to change their taxation policies. We would be as offended if they did that to us. We are simply using many, many examples whereby minority religions, again this is much broader than Scientology, are persecuted in Germany. We are asking for them to reaffirm a position, simply to reaffirm their position which their Constitution states, and that is that they endorse religious tolerance in the country of Germany.

Yes, they are an ally, and yes we treasure that relationship, but we ought to be able to go to them and tell them the things which trouble us.

I was talking with the gentleman from Ohio [Mr. Ney], and he pointed out in the paper this morning that there was a German citizen who was just granted asylum in this country because of religious persecution in Germany. Yes, that is right, granted asylum in this country because of religious persecution in Germany. We have got to do all that we can to stop that.

And again, I want to reaffirm it is much more than taxation. That was simply one of the ideas that we enumerated in the many ideas or the many examples of religious intolerance in Germany. Let us get beyond that. Let us read the bill, because it is much

broader than that, and let us practice what we preach and stand for religious tolerance across the globe.

Mr. BEREUTER. Mr. Speaker, I yield 2 minutes to the gentleman from Massachusetts [Mr. Frank].

Mr. FRANK of Massachusetts. Mr. Speaker, I am opposed to this resolution, and I think that I am as sensitive to the issue of persecution as anyone. I believe I am the leader in minority group membership in the House, claiming two myself, and I am going to vote against this resolution.

I would not vote for a resolution that approved of the way Germany is dealing with the Scientologists and others, but I do not believe a case has been made to do the very, very solemn act of having this House of Representatives single them out for condemnation. There are a lot of things in this world of which we disapprove, and I think the gentleman from Virginia quite correctly pointed out that if we were going to make a list of practices worthy of condemnation in this great democratic institution, even those critical of Germany's treatment of Scientologists would put it much lower on the list than practices that have gone unmentioned here. So there is a disproportion.

Secondly, and I understand from my friend from Arizona that is in the resolution, my colleagues cannot disclaim it, they also have in the resolution a specific example that people in the youth wing of two political parties boycotted movies. Well, I do not always like people who boycott movies, but are we going to have a resolution condemning the Baptists for condemning Disney? I mean, to intermingle genuine religious persecution with a decision by private individuals to boycott a movie is a mistake. It is also inappropriate.

Also I do think we should practice what we preach, but I do not think we should preach what we do not practice. If we are going to look at people who are engaging in inappropriate religious persecution, I think the Governor of Alabama would be on my list. I think people who are atheists and agnostics in parts of Alabama are under assault and having their constitutional rights impinged by the Governor of Alabama.

The fact is that Germany is overall a very democratic nation. It is not perfect. There are not a lot of perfect countries around. But to single out Germany this way while other countries that have far worse patterns of abuse are ignored, to intermingle legitimate efforts like a boycott by political parties with actual persecution and to ignore some of the problems we have ourselves is wholly inappropriate.

So, Mr. Speaker, I do not think this resolution ought to pass.

[Page: H10523]

Mr. BEREUTER. Mr. Speaker, I thank the gentleman from Massachusetts for his strong statement.

Mr. Speaker, I yield 2 minutes to the gentleman from Florida [Mr. McCollum].

(Mr. MCCOLLUM asked and was given permission to revise and extend his remarks.)

Mr. MCCOLLUM. Mr. Speaker, I thank the gentleman for yielding this time to me, and I rise today in opposition to this resolution mainly because I have experienced a discussion over a period of time as a member of the Congressional study group on Germany with German members of Parliament about the issue, particularly of persecution of Scientologists and those reports we have had.

I recall going over there earlier this year and engaging in quite a lengthy discussion with several of their members over this matter, and I have examined the paperwork and the documents and the press accounts and so on, and I am not here today to be able to talk about every instance of allegation of somebody being persecuted with respect to a particular religion, but with respect to the Scientologists in particular I am unconvinced that the Germans are in any way persecuting them.

Germany has a different kind of system for recognizing religions over there than we do, and I do not necessarily agree with that, but they have a system in which there is not tithing like we have. They collect the taxes from the people, the contributions, if my colleagues will, to the churches, and apportion them out to the various churches that are recognized, if my colleagues will, by the government. I do not, again like I say, necessarily agree with that, but the fact that they do not think that Scientology merits their giving them this status and the, quote, persecution that people perceive occurring simply because they are not recognized for purposes under the German Government's auspices to practice religion is not a reason to have this resolution out here today.

The truth of the matter is that Scientologists are perceived over there, rightly or wrongly, and some have said that here in this country, I do not know if it is right or wrong, as having persecuted some of their own members. There are those who I have heard over the years allege that it is difficult to ever quit the Church of Scientology. There are parents that have complained their children have been held in against their will. There are all kinds of arguments like that.

But I was hearing in Germany, again I do not know the merits of them, but that is what the German Government believes. It is not just an issue of taxation. They do not think that this group, that is the Scientologists, are truly deserving of their recognition. It is not a matter of are they Christian, are they

Buddhists, are they whatever, it is a matter of the way they behaved in Germany and their belief that they are not indeed entitled to this recognition.

So I would urge a defeat of this resolution. It is very, very damaging to our relationship with Germany.

Mr. BEREUTER. Mr. Speaker, I thank the gentleman from Florida for his strong statement.

Mr. Speaker, I yield 2 minutes to the distinguished gentleman from Ohio [Mr. Oxley] the chairman of the German American study group.

(Mr. OXLEY asked and was given permission to revise and extend his remarks.)

Mr. OXLEY. Mr. Speaker, I also rise in opposition to this, I think, well-intentioned effort, but what is really the purpose behind this resolution? Is it to embarrass the German Government? Is it to embarrass the German people? What will ultimately come out of passage of this resolution? I frankly fail to see what good it would do.

As the gentleman from Nebraska [Mr. Bereuter] indicated, I am the chairman this year of the congressional study group on Germany and have had numerous discussions with our colleagues from the Bundestag particularly and also with the German Ambassador about this very sensitive issue.

I was concerned, frankly, when I looked at a copy of the letter from the German Ambassador to the distinguished chairman of the Committee on International Relations, the gentleman from New York [Mr. Gilman], in which he indicates that he had offered to have a discussion with those who would support this amendment, and as near as I can tell, and this was dated October 29, has had no opportunity whatsoever to tell the German side of the story on this matter. I find that frankly appalling when Germany is one of our staunchest allies and ones who have a great deal at stake in our success in Europe, expanding NATO, expanding trade relations and the like. And so instead of trying to stick a needle in the eye of the Germans, it seems to me we ought to be more helpful in trying to come to understand what these problems are.

I find the language in this resolution quite strong, particularly when it talks about a German fostering an atmosphere of intolerance toward certain minority religious groups. Then it goes on to say the resolution expresses concerns that artists from the United States, members of minority religious groups, continue to experience German Government discrimination. Now, I fail to see how the German government is somehow behind these boycotts of certain movies. There may be particular political groups, but as the gentleman from Massachusetts [Mr. Frank] said, that happens all the time over here.

So I would say to our friends, let us defeat this resolution and look toward a more positive attitude as we relate to our strong allies such as Germany.

Mr. BEREUTER. Mr. Speaker, I yield myself such time as I may consume.

Mr, Speaker, I understand the other side has a closing statement, and so I will conclude the opposition to the resolution, and I do rise and continue my strong opposition to the resolution.

Germany is a free country in which religious freedom isguaranteed under the Constitution and thus sacrosanct. The U.S. State Department country report on human rights clearly confirms this in its most recent report.

I would add that I think we need to be reminded every time that what we do as a body expressing our views on foreign policy is taken very seriously. This resolution is not balanced. It singles out Germany for a variety of practices, particularly those related to Scientology where their position is no different than seven or eight other European countries and several other countries outside the European Continent.

[Page: H10524]

[TIME: 1815]

This is a troubling situation for them. It is a matter that is pending currently in their tax court. But I think it is important we not have Tom Cruise or John Travolta setting foreign policy in this country, and I think that is a driving factor behind this legislation. It is very unfortunate. I urge my colleagues to oppose the resolution.

Mr. Speaker, I yield back the balance of my time.

Mr. GILMAN. Mr. Speaker, I yield the balance of my time to the gentleman from Ohio [Mr. Ney], who will give our concluding remarks.

Mr. NEY. Mr. Speaker, it is probably pretty good we are coming down to the closure, because now we are coming down to the ridiculous, to mention that Tom Cruise and John Travolta are setting foreign policy. John Travolta and Tom Cruise and Ann Archer and Chick Corea are fortunate enough to have a celebrity status that can bring attention to the issue of discrimination, not alleged, not taxation, but discrimination.

So I am glad that their intent is not to set foreign policy, but they have given of their time to set forth a cause that is very, very important to those who cannot be on this floor to speak or, to those who do not have celebrity status, to be able

to be heard, not only here, but in Germany.

This is not about taxation. Let me tell you about support, as far as people saying this does not have support. Things do not get lightly here to the floor. This was not introduced yesterday. This has been around. It has support, because Democrats and Republicans have voiced that they want this on the floor tonight, Mr. Speaker. They want the people of this country and the people around the world to understand this issue, Mr. Speaker.

And the fact that now our Government has gone a step further and has officially granted asylum, do you know how hard it is to get asylum? Our Government stated yesterday, it was in the Washington Post today, that asylum has been granted to a German citizen because they dared to be something different, of a different religion, than us. That is how far this has gone.

Painful words, someone said. It is a shame we are to the point of what someone may consider painful words. The reason we have painful words is because there have been painful deeds, not something someone has made up, but posters that say 'no thank you' to a play on the word of 'sect,' of minority religions.

It goes a little beyond that. Those official sanction posters that have a fly swatter to swat at those pesky little minority members of a religion. It has gone to the point of not someone saying, let's not watch a movie, but of a government that has told citizens of the United States that you in fact shall not perform in the country of Germany because you are a different religion that we just simply do not like that is the type of thing that has occurred.

I went to Germany. We tried to talk about this and got the first pounding that, we will not talk about it. As far as primary sponsors, I would ask any of my colleagues if either side of the aisle sitting on the floor of this House tonight, Mr. Speaker, if anybody from the German Embassy called them, because I have been out front on this issue for religious freedom for minorities, and we haven't had any calls, and I did a quick check, and nobody I know of supporting this has had any type of call in fact.
<p>All we know is in the press. Today in Germany, they just said, as a matter of fact, an official of the German Government simply said this will not be brought up by the U.S. Congress until after January maybe to be discussed, because I guess they set our foreign policy now.

So no matter how good an ally, the real shame tonight is the fact that they have not wanted to communicate on this issue. The fact is, they continue to want to choose who in fact from this country can go to their country, who in fact they will put under surveillance because they simply do not like the type of religion they are.

These are Americans we are talking about. We are not out to

destroy the relationship of our country, but we are talking about standing up for the rights of our own American citizens. That is what this is about tonight.

We cannot turn our back any longer on this issue. It has been mentioned about the other religions, about the Baha'is. It has been mentioned about persecution of people around the world. I am sorry other things have not hit the floor. I am not saying they are not important. I believe that we should stand up for persecution around the world. We have done it in some votes, obviously, with Chinese resolutions.

But just because those resolutions didn't hit the floor of this House tonight does not mean this is not any more important.

So this is not something fabricated, this is not something we are anti-German and we just wanted to bring this up tonight because we didn't have anything to do. These are serious true incidents that have happened over and over and over. Members of Congress have stated their feelings about this and tried the diplomatic route over and over and over. And, yes, this does have support, and that is how this did end up on the floor of this House tonight.

This is about standing up, no matter what you think of another religion, for American citizens' rights, and if the Democrat or the Republican Party dared, dared, on the registration forms in the United States to say, 'Are you a Catholic or not?' or, 'Are you a Protestant, or are you a Muslim, or are you a Jew?' if that dared to happen in this country, do you know what type of outcry there would be? On the forms, it happens over there about certain religions only: Are you a member or not?

It does exist; it is real; we need to stand up.

In closing, I am a Roman Catholic of German background tonight that stands on the floor simply saying, in fact, we have to stand up for religious freedom tonight. Our country was found that way. They didn't say bring in your tired, your poor, and the religion that we choose that can come here. This is so basic to American principles that everybody should voice their support of this.

I urge the bipartisan support of standing up tonight, not to slap at another country, but to stand up tonight for religious freedom.

Mr. GILMAN. Mr. Speaker, I yield back the balance of my time.

The SPEAKER pro tempore. All time has expired. The question is on the motion offered by the gentleman from New York [Mr. Gilman that the House suspend the rules and agree to the

concurrent resolution, House Concurrent Resolution 22, as amended.

The question was taken; and on a division (demanded by Mr. Bereuter) there were--ayes 3, noes 12.

Mr. SALMON. Mr. Speaker, on that I demand the yeas and nays.

The yeas and nays were ordered.

The SPEAKER pro tempore. Pursuant to clause 5 of rule I and the Chair's prior announcement, further proceedings on this motion will be postponed.

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United States Consul,
Vancouver, British Columbia, Canada

Berlin, December 5, 1997

Dear Sir/Madam,

We wish to express our condolences to you and the American people for the death of Lisa McPherson, exactly two years ago on December 5, 1995, and to express our concern over the human rights violations committed by the US headquartered organization known as Scientology towards its members, including many US citizens.

Lisa McPherson entered Scientology in 1982. She became a model Scientologist who had paid over \$175,000 in her last five years. On November 18, 1995, she had a minor automobile accident. She behaved strangely at the scene of the accident, even going so far as to take her clothes off in the street and to ask for help, and was subsequently taken to a hospital for a psychological evaluation. Scientologists quickly got her out of the hospital against the advice of the doctor, claiming that she would get "rest and relaxation" at the Fort Harrison Hotel (the "spiritual" headquarters of Scientology in Clearwater, FL). There, they claimed, she would be able to avoid "the psychs," a Scientology term for psychologists and psychiatrists, whom Scientologists hate with a passion.

17 days later, Lisa McPherson was dead at the age of 36.

The autopsy showed that the cause of death was a blood clot which had been caused by bed rest and severe dehydration; the medical examiner said that McPherson had gone without fluids for five to ten days and was unconscious for up to 48 hours before her death; her hands showed bite marks from cockroaches. The organization of Scientology, its attorneys and some of its members have stonewalled investigations by the police, her family, and the press. But documents gathered through a lawsuit started by her family show that she went through a terrible ordeal, during which she was held against her will and was illegally given the potent sedative chloral hydrate without proper medical supervision, while Scientologist clerks, librarians, and other non-medical personnel watched her lose her mind and her life. After her death, fellow Scientologists looted Lisa's bank account with forged personal checks.

We wish to express our support for the American people and the American government in ending human rights violations against US citizens and other people, committed by the Scientology Organization.

As German friends [or any friends] of the United States of America or as US citizens, we are concerned that the organization responsible for the tragic death of Lisa McPherson is trying to damage the German-American friendship for which we have all worked so very hard during the last decades.

Because of the staunch position the United States takes concerning human rights worldwide, we call on the American government to confront and stop human rights violations being committed by Scientology and to reestablish in the country of democracy the true freedom of life, speech, religion, personality and pursuit of happiness, which includes:

- Freedom for everyone to speak about his experiences, knowledge and thoughts in any organization, church or cult, be it religious or not;
- Freedom for members of an organization, church or cult, religious or not, to leave that organization, without being detained, threatened or persecuted;
- Freedom from fear of being confronted with material that a religious or therapeutic organization has obtained through religious or spiritual counseling; Such material should not be allowed to be used for publication, litigation, or blackmail;
- Freedom from persecution through Copyright Laws; such laws should not be used against members who try to support their arguments by citing "church scriptures" or "spiritual literature" or other texts associated with the group;
- Full application of law enforcement to prosecute fraud, mental and physical abuse hidden behind the shield of "religion";
- Refusal / Withdrawal of tax exemptions for secretive organizations, be they religious or not. Full disclosure of past secret agreements with the IRS.

The German / U.S. Citizens Committee on Human Rights and Religious Freedom in the USA

(Deutsch-amerikanisches Bürgerkomitee für Menschenrechte und Religionsfreiheit in den USA)

P.S.: We express our thanks to the 318 members of Congress who refused to let John Travolta and Tom Cruise run US foreign policy and opposed the House Concurrent Resolution 22.

More media Information:

Tampa Channel 28 News, October 14, 1997, 6:00 p.m.

St. Petersburg Times, October 31, 1997

Newsweek, July 21, 1997

The New York Times, March 9, 1997

TIME, May 6, 1991

Joe Cisar, Cleveland, OH (vietnam veteran)

Sandra Jamison, USAF AD/DW

Gerry Armstrong, now Canada, artist

Tilman Hausherr, Berlin

Thomas Gandow, Berlin, Pfarrer (Lutheran minister)

Ute Gandow, Berlin, Hausfrau

Conveyed by Gerry Armstrong
Now in Chilliwack, B.C.
(604)795-5852

Signatories in alphabetical order:

Gerry Armstrong, now Canada, artist; William C. Barwell, Houston, TX; Heidrun Beer, Schottwien (Austria), Software developer; Eva Beisiegel, Berlin, Politologist; Volker Benedikt, Villingen-Schwenningen, Teacher; Klaus-Uwe Benneter, Berlin, attorney and notar; Dr. Hans-Ulrich Berndt, Berlin, director of studies; Liane von Billerbeck, Berlin, Journalist; Jutta Birlenberg, Leverkusen, KIDS e.V.; Carola Burgtorf, Berlin, Biologist; Monika Buttgereit, Berlin, vice-chairwoman of Berlin SPD; Ursula Caberta, Hamburg; Joe Cisar, Cleveland, OH (vietnam veteran); Forrest L. Cole, Stockbridge, GA, Refund Consultant; Bernd Donatus, Berlin; Ursula Dyckhoff, sociologist & urban planner; Tom Elliott, Ontario, Canada; Dr. Andreas Finke, Berlin, Lutheran minister & scientific assistant; Dirk John Fischer, Youngstown, OH, videograph; Jonas Flygare, Sweden, Software developer; Thomas Gandow, Berlin, Lutheran minister; Ute Gandow, Berlin, Housewife; Marion Gerhardt, Berlin, sociologist; Friedrich Griess, Vienna (Austria), Engineer; Thomas Härtel, City Council for school and youth (SPD), Berlin-Steglitz; Tilman Hausherr, Berlin, Software Developer; H. Keith Henson, Palo Alto, CA, Computer Consultant; Ralph Hilton, Schottwien (Austria), Ex Scientology staff member; James Hornsby, CA, Student; Odette Jaccard-Fuchs, Zürich (Switzerland), housewife, AGSD; Sandra Jamison, USAF AD/DW; Frank Kempe, Berlin, Student; Gerald Kluge, Meissen, Chaplain; Kurt Kreibohm, Berlin, Lutheran minister; Holger Kulick, Berlin, Writer; Friedrich von Kymmell, Usedom, Lutheran minister; Michael Laudeley, Dresden, cult awareness group of the students council of TU Dresden; Jaan J. Leppik, Tallinn, Estonia, Lutheran Deacon; Stefan Liebke, Berlin; Dr. Paul-Stefan Mauz, MP, Stuttgart, spokesperson on cults of CDU group in state parliament; Ted Mayett, Las Vegas, NV; Klaus Mischke, university teacher, Berlin & Stockholm; Winfried Müller, Jena, "religio" database admin; Ehrhart Neubert, Berlin, CDU, former east german civil rights activist; Manfred Neumann, Berlin, Psychotherapist; Frank Nordhausen, Berlin, Journalist; Werner Penski, Berlin, Engineer; Christa Pirwaß, Berlin, sexton; Solveig Prass, Leipzig, PR Gewandhaus zu Leipzig (concert hall); Michael Reinig, Berlin, personnel chief; Renate Rennebach, Berlin, Member of Parliament (SPD); Günther Ruhs, Leverkusen; Hella Santarossa, Berlin, Painter; Hiltraut Schierenberg, Berlin; Helmut Schmidt, Berlin, industrial salesman; Dr. Albrecht Schröter, Jena; Hugo Sopp, Berlin, retired Lutheran Minister; Peter Tautfest, Washington, US correspondent for "taz"; Wolfgang Thierse, MP (SPD), party vice-chairman; Dr. David S. Touretzky, research scientist, Pennsylvania; Eduard Trenkel, Kassel, Lutheran minister; Alfred Weinert, Berlin; Liselotte Wenzelburger-Mack, Großbettlingen, holder of the cross of merit for the federal republic; Prof. Dr. Hartmut Zinser, Berlin; Ursula Zöpel, Leverkusen, Teacher

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December 3, 1997 (2nd Draft)

BRAINWASHING IN SCIENTOLOGY'S REHABILITATION PROJECT FORCE (RPF)

Revised Version of a Presentation at the Society for the
Scientific Study of Religion, San Diego, California (November 7,
1997).

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BRAINWASHING IN SCIENTOLOGY'S REHABILITATION PROJECT FORCE (RPF)

Introduction

As an international institution requiring total compliance from its confined participants, Scientology's Rehabilitation Project Force (RPF) is unique among contemporary ideological organizations operating in the Western world. While other organizations (such as The Family/The Children of God) have operated analogous programs (see Kent and Hall, 1997), the RPF has existed for over 20 years. Established in January, 1974, the RPF is a program of hard physical labour, forced confessions, and intense ideological study. Scientology insists that the program is designed to correct staff members' problems in order to allow them to remain in its elite Sea Org and operate effectively in it. Critics insist that its purpose is to break the will of inmates in a manner that minimizes people's abilities to operate outside of the ideological constraints of the organization. They also argue that it provides Scientology with a labour force that receives almost no salaries. In any case, newspapers have reported on the program since at least 1984, with stories appearing in American, British, Danish, and German media. No academic accounts about it exist, however, even though its operation has direct bearing on an issue that many social scientists consider closed--the extent to which so-called new religions utilize "brainwashing" techniques on their members.

This study argues that brainwashing--"the systematic, scientific[,] and coercive elimination of the individuality of the mind of another" (Schefflin and Opton 1978: 40)--is a social scientifically appropriate concept for analyzing Scientology's imposition of reindoctrination programs within the confinement conditions experienced by inmates in the RPF and its more severe extension, the RPF's RPF. It constructs this argument using primary documents that Scientology's founder, L. Ron Hubbard, either wrote or disseminated, as well as legal documents, interview transcripts, and media accounts. These documents and other items help identify Scientology's historical and organizational contexts out of which the RPF emerged, and they provide extended glimpses into actual RPF operations in several locations during particular periods. Of special interest to scholars is the study's use of Scientology publications from the mid-1950s and late 1960s that specifically discuss brainwashing techniques. Not only, therefore, is brainwashing an appropriate social scientific term to use when describing the RPF, but also it is a term that coincides with Scientology's own descriptions about forcing attitude change within confined environments. The "Brainwashing Debate" within the Social Sciences

The "brainwashing debate" in the social sciences took place mostly in the 1980s and early 1990s, when several professional organizations, professors, and scholars reacted against American

courts accepting arguments that so-called new religions "coerced" members into conversion. Much of the sociological attack targetted psychologist Margaret Singer, Ph.D., who used a coercive persuasion/brainwashing model to explain to courts how litigants joined and behaved in the groups they now were suing or defending against.

The social scientific attacks concluded that the brainwashing term was valid only if the group in question used incarceration and physical maltreatment against members (see Anthony, 1990: 304) in situations of uninformed consent (Young and Griffith, 1992: 93). This threefold requirement was a minimalist one, since a brainwashing program also would have to include an intense indoctrination program coupled with personal confessions of past "sins." Since neither the term's supporters or detractors provided concrete evidence that even these minimalist activities uniformly occurred in most groups' conversion activities, sociologists and others concluded that "brainwashing" was not an appropriate term for describing how and why people join new or controversial religions.

Of these requirements for using the brainwashing term, the single most important one was "extreme physical coercion" (Anthony and Robbins, 1992: 20, 25n.11). If such a condition existed, then it would allow both researchers and the courts to isolate brainwashing from other forms of coercive persuasion. As Robbins and Anthony concluded, "[without] physical force as a boundary, there is no natural or objective cutting point as to when coercive persuasion is potent enough to overcome free will" as the brainwashing model implies (Anthony and Robbins, 1992: 21).

One crucial aspect of brainwashing in litigation has been an effort to specify when courts should allow individuals to use the concept as an excuse for deviant or illegal behaviour. Researcher Dick Anthony (often working with associate Tom Robbins) developed much of the theory in this area, and served as a consulting expert for lawyers defending the Unification Church, Scientology, the International Society for Krishna Consciousness (ISKCON), Transcendental Meditation, and the Community Chapel against brainwashing allegations from disgruntled former members (Anthony and Robbins, 1992: 6n.1). Anthony and Robbins concluded that some attempts to utilize "cultic brainwashing" to justify exemptions from (American constitutional) protections of religions presuppose that brainwashing is a form of "hard determinism" which assumes that people are confined in ideological systems whose doctrines they must adopt (Anthony and Robbins, 1992: 23). Human behavior explanations that postulate hard determinism, Anthony and Robbins claim, "do not have general, or even substantial acceptance in the relevant scientific communities" (presumably sociology and psychology), and they are "no longer taken seriously in the academic world" (Anthony and Robbins, 1992: 25). Consequently, in future attempts to assess "the resemblance of the theologies of religious groups to totalitarian

ideologies," Antony and Robbins hope that researchers will focus upon "the free marketplace of ideas rather than upon increased governmental regulation of religious ideas or on the outcome of trials..." (Anthony and Robbins, 1992: 26). In other words, these respected social scientists believe that research into whether religious groups brainwash has concluded that they do not do so at least in a hard deterministic way, and this conclusion eliminates any need for discussion about governmental or legal intervention against religions on now-disproven grounds that they brainwash their members into robots who commit deviant or criminal acts.

RPF Accounts in the Courts and the Media

Remarkably, however, throughout much of this debate, the popular press, some court documents, and at least one court appellate decision described the forced confinement, maltreatment, and uninformed consent that Sea Org members experienced in Scientology's RPF program and facilities. These descriptions were of a brainwashing program used to retain members rather than to obtain them, and perhaps for this reason social scientists neglected to address these accounts.

The first public statement about the RPF seems to have appeared in a January 25, 1980 affidavit by former member Tonya Burden of Las Vegas, Nevada, who described it as "a Scientology 'concentration camp'" (Burden, 1980: 8) and from which she escaped after having been in the program for around three months (Burden, 1980: 9-10). Former member Gerry Armstrong supported Burden's general description of RPF conditions in a June, 1982 affidavit, stating that he "personally observed people [including Tonya Burden] in the RPF sleeping on floors, in storage rooms, in the boiler room, and in other sub-human conditions..." (Armstrong, 1982: 3).

Armstrong and two other former members, Laurel Sullivan and William Franks, spoke harshly about the RPF in a 1984 article in the Florida newspaper, the Clearwater Sun. Franks called it "'a horrible thing'" (quoted in Shelor, 1984: 1B), and Sullivan spoke about how "'rough'" the program was, having "to work in 120-degree heat [in the California desert] with a severe case of colitis'" (quoted in Shelor, 1984: 2B). In that same year, Great Britain's The Sunday Times Magazine carried RPF descriptions from three more former members--Bent Corydon, Jay Hurwitz, and David Mayo:

Hurwitz said that for the first five days he and others were kept locked up under guard. 'We were brought our food and we slept on the floor. We had to use the same toilet facilities in the presence of one another' (Barnes, 1984: 38).

Hurwitz was at the RPF near Gilman Hot Springs, California in the summer of 1982, along with eighteen other senior Scientology staffers (Barnes, 1984: 38-39). Also in 1984, a British court stated in a written decision that, two years earlier, a woman in Scientology's English headquarters in East Grinstead was "required to do at least 12 hours physical work a day (shifting

bricks, emptying bins, etc.)" which "aggravated a chronic back condition" (Royal Courts of Justice, 1984: 27). This same story reappeared in the excellent study written by Englishman Jon Atack in 1990 (Atack, 1990: 341), and then in a newspaper article in 1994 (Bracchi, 1994).

Back in the United States, former member Don Larson told Forbes magazine in 1986 that:

he alone brought nearly 300 recalcitrant Scientologists to 'Rehabilitation Project Forces' at Scientology centers around the world over a period of fourteen months, until his departure in late 1983... In these sadistic detention programs, staff members would be coerced into performing hard labor, eating leftovers out of buckets and sleeping on floors. Some were reportedly kept against their will (Behar, 1986: 318).

The year after the Forbes article, British biographer Russell Miller (1987) published his account of Hubbard's life, which contained nearly a dozen references to the RPF.

A 1989 California appellate court decision indicated that, "continuously for three weeks," former Scientologist Larry Wollersheim had been "'baited and badgered'" to enter the RPF, which the judge mentioned as "evidence [that] Wollersheim accepted some of his auditing [i.e., religious counselling] under threat of physical coercion" (California Court of Appeal, 1989: 9274). The accounts of Franks, Sullivan, and former Sea Org staff member Hana Whitfield appeared again in a series on the organization that the Los Angeles Times published in 1990 (Welkos and Sappell, 1990). The article indicated that "[t]he RPF provides the church with a pool of labor to perform building maintenance, pull weeds, haul garbage, clean toilets or do anything else church executives deem necessary for redemption" (Welkos and Sappell, 1990: [25]). In the same year as the Los Angeles Times series, Jon Atack's thorough study of his former group contained significant RPF information (Atack, 1990: 206, 341, 358, etc.; see also Atack, n.d.: 9-10). Finally, as recently as 1996, the RPF received attention in a Scientology study produced by former member Bent Corydon (1996)--himself having been an RPF inmate. Taken together, these legal and media sources strongly suggest that the RPF is a brainwashing facility according to the requirements that Anthony (1990) and Young and Griffith (1992) specify, but no social scientists pursued an investigation.

Methodological Issues

Perhaps one reason that social scientists have not examined the brainwashing dynamics of the RPF is because its study presents some unusual methodological obstacles that they must overcome in order to obtain appropriate information. First, Scientology has made out-of-court settlements with former RPF victims, and these settlements include agreements that they will not speak critically and publically against the organization. I know of at least five people--two Americans, two Canadians, and

one New Zealander--who entered into such agreements.

Second, Scientology keeps confidential the key series of documents that define the RPF's operation. These documents appear in the Flag Order 3434 series (containing at least fifty-six separate issues), and only a small number of them have leaked out to researchers. Consequently, it remains impossible to trace the development of the RPF program through the organization's most relevant documents, which means that scholars' best information sources remain the accounts of former members.

Third, former members who went through the RPF are difficult to find and, once found, often are reluctant to speak with a researcher. The difficulty of finding former RPF inmates stems partly from the fact that the program's design is to feed repentant (and some would say emotionally broken) Sea Org members back into the organization. Consequently, many potential informants remain in Scientology under threat of being either excommunicated or sent back into the RPF itself for talking negatively about their time in it. Moreover, as RPF participants they spent countless (and in some cases, hundreds) of hours confessing to alleged sins and crimes, and they fear that the organization would use these confessions against them if they were to talk. Indeed, the RPFers who complete their programs must write or sign a statement before they leave which praises the RPF and extols its virtues. For all of these reasons, I did not attempt to interview active Scientologists who had been RPF inmates. Any criticism or negative statements that informants might have made about their experiences likely would have had dire consequences for them.

For this study, therefore, I interviewed six people who had been on RPFs in different parts of the world, plus I collected court documents, affidavits, and correspondence from fourteen more. In addition, I interviewed a person who had witnessed the RPF in operation (but had not participated in it), and collected accounts (through personal correspondence, anonymous newsgroup postings, and legal documents) from eight additional individuals who also claim to have seen inmates on the program. In addition to the information by and from these twenty-nine people, I collected primary Scientology documents and publications that discuss the RPF, along with accounts of it from the popular press. The picture that emerges from these sources shows variations according to (sometimes important) details, but the overall picture concerning the operation of the program remains remarkably consistent.

Ideational History of the RPF

Five (often overlapping) activities of social control seem universal in all of the RPF information that is available from non-Scientology sources. These activities are: (1) forcible confinement, (2) physical maltreatment (through such things as hard exercise, physically demanding chores, poor diet, limited time for hygiene, and inadequate sleeping arrangements, etc.); (3) social maltreatment (through restrictions in verbal and

written communication with others, degradation, very low pay, etc.); (4) intensive study of ideology, and (5) forced confessions of past alleged 'sins.' The goal of these activities is the alignment of the RPF inmates with the ideology of Scientology as directed by its leaders. This alignment comes about after the program has eliminated people's abilities or desires to criticize policies or the leaders who oversee their implementation. Remarkably, a 1955 booklet that Hubbard himself almost certainly wrote described psychopolitical techniques of subduing people and populations to totalitarian rule, and some of the techniques foreshadow the RPF policies that subsequently he approved for use against his own elite corps.

Hubbard's Brainwashing and Psychopolitics Manual

The booklet was entitled, Brain-Washing--A Synthesis of the Russian Textbook on Psychopolitics, and one version was "published as a public service by the Church of Scientology" ([Hubbard?, 1955: back cover). The introduction purports to be a speech by the famous chief of the Soviet secret police, Lavrenti Beria, to "American students at the Lenin University" about how to subvert societies through the imposition of "psychopolitics" on populations through the guise of "mental healing" (Hubbard [probable author], 1955: 3). The entire text is fraudulent (Kominsky, 1970), and all indicators point directly to Hubbard as the author. In any case, Hubbard wrote about the "brainwashing" booklet to his followers (Hubbard, 1955a: 309-310; 1955b: 312-313; 1956: 328), claiming that "unless the basic philosophy of the brainwasher is understood," auditors will have difficulty handling clients who had suffered the techniques (Hubbard, 1955a: 309). More probably he was trying to both discredit psychiatry and endear his organization to the American government (with the claim that Dianetics and Scientology could reverse the effects of Communist brainwashing and thus was a powerful political tool). Certainly Hubbard's desire to secure Dianetics and Scientology as a weapon against Communism would explain why he wrote the FBI about the booklet in mid-December, 1955. It also would explain why The Church of Scientology published the slim volume "as a public service" (back cover of Hubbard [probable author], 1955).

Obsessed with issues of controlling and subduing people and nations, the "brainwashing" manual is an extraordinary work. Most probably, key ideas that Hubbard (presumably) wrote about in the brainwashing manual became policies and procedures in the RPF nearly twenty years later. The manual's own definition of psychopolitics, for example, indicated that it was "the art and science of asserting and maintaining dominion over the thoughts and loyalties of individuals, officers, bureaux, and masses, and the effecting of the conquest of enemy nations through 'mental healing'" (Hubbard [probable author], 1955: 6). Later the text presented a strategy for subversives to use in destroying individuals' opposition to the state, and this strategy involved the destruction of any forms of individuality that might foster doubts against the imposing ideology:

[t]he tenets of rugged individualism, personal determinism, self-will, imagination, and personal creativeness are alike in the masses antipathetic to the good of the Greater State. These wilful and unaligned forces are no more than illnesses which will bring about disaffection, disunity, and at length the collapse of the group to which the individual is attached (Hubbard [probable author], 1955: 9).

Having identified individuality as a threat to "the Greater State," the solution was simple:

It is the mission of Psychopolitics first to align the obedience and goals of the group, and then maintain their alignment by the eradication of the effectiveness of the persons and personalities which might serve the group toward disaffection.... Psychopolitics makes it possible to remove that part of his personality which, by itself, is making havoc with the person's own constitution, as well as with the group with which the person is connected (Hubbard [probable author], 1955: 10).

In essence, the State had to establish its own goals as the only acceptable ones, then destroy aspects of people's personalities that might lead them to individualistic expressions that would be out of alignment with those goals. This outline for totalitarian conformity transformed into the reality of the RPF.

Hubbard's Discussions of Brainwashing in the Late 1960s

During the late 1960s, Hubbard discussed brainwashing at least four times in various talks and writings, and these discussions always were consistent with the basic techniques of personality destruction and goals-realignment discussed in the "brainwashing" manual of 1955. The book, *All About Radiation*, bridges the 1960s and the 1950s, since Hubbard took his comments from a 1957 "Congress on Nuclear Radiation and Health," published them that same year, then reissued the book in 1967. This publication included a section entitled "What Brainwashing Is":

Brainwashing is a very simple mechanism. One gets a person to agree that something might be a certain way and then drives him by introverting him and through self-criticism to the possibility that it is that way. Only then does a man believe that the erroneous fact was a truth. By gradient scale of hammering, pounding and torture, brainwashers are able to make people believe that that these people [i.e., the victims] saw and did things which they never did do (Hubbard, 1957: 84; also quoted in Hubbard, 1976b: 55).

As he had indicated in 1955, people could be brainwashed (he believed) by giving them an external goal or fact, then breaking them down (through stress) until they believed it.

Two years after the reissue of *All About Radiation* (on December 20, 1969), Hubbard discussed brainwashing again, but added a twist. Now he defined it as the "subjection of a person to systematic indoctrination or mental pressure with a view to getting him to change his views or to confess to a crime" (quoted in Hubbard, 1976b: 55). Not only, therefore, did Hubbard believe

that he knew how to force people to change their minds on vital issues, but also he thought that he could force (presumably false) confessions out of people by "brainwashing" them through severe stress. Again these insights bore fruit in the RPF environment.

Additional glimpses into Hubbard's knowledge about brainwashing comes from a March, 1969 Scientology article in the organization's Freedom newspaper. At the time of initial publication, the article entitled "Brainwashing" did not reveal its author, and only after 1992 were researchers able to verify that it came from Hubbard himself (see Church of Scientology International, 1992: 757). The article contained a long excerpt from a politically conservative writer, Robert G. Ridgway (followed at the end by Hubbard's comments), and one section of Ridgway's commentary contained a section subtitled "Nervous Breakdown." It described techniques designed to break down individuals and then build them up into the externally defined goals of the group:

'The first part in the technique of brainwashing is an artificially induced nervous breakdown, which breaks the line with the individual's past experience and casts him adrift in a sea of suggestibility. This is brought on by exhaustion, confusion, continuous physical pain, and fear and anxiety. This destroys human individuality and identity by fracturing fixed habit patterns and employing the useful fragments, cemented by suggestion, to rebuild an entirely different personality. Memory is diffused. Logic is confused, and judgement is distorted in the absence of reference and discipline. The person has lost control of his mind--it is then that suggestion is most effective. The victim is grateful to be oriented again. He appreciates any purpose or direction given to him. He feels he has been led back to sanity, [but] in reality his soul has been stolen. This was done to American fathers in Korea and their sons in Vietnam' (Ridgway, quoted in [Hubbard], 1969: [4]).

Similar to Hubbard's writing in the previous decade, this article identified the necessity of destroying individuality (accomplished here through inducing nervous breakdowns) and then aligning the shattered personality with officially provided purpose and direction.

Hubbard (we presume) had made a similar argument about breaking down people in the brainwashing manual of 1955. The manual stated that:

There is a curve of degradation which leads downward to a point where the endurance of an individual is almost at an end, and any sudden action toward him will place him in a state of shock. Similarly, a soldier held prisoner can be abused, denied, defamed, and degraded until the slightest motion on the part of his captors will cause him to flinch. Similarly, the slightest word on the part of his captors will cause him to obey, or vary his loyalties and beliefs.

Given sufficient degradation, a prisoner can be caused to murder his fellow countrymen in the same stockade. Experiments on German prisoners have lately demonstrated that only after seventy days of filthy food, little sleep, and nearly untenable quarters, that [sic] the least motion toward the prisoner would bring about a state of shock beyond his endurance threshold, and would cause him to hypnotically receive anything said to him. Thus, it is possible, in an entire stockade of prisoners, to the number of thousands, to bring about a state of complete servile obedience, and without the labour of personally addressing each one, to pervert their loyalties, and implant in them adequate commands to insure their future conduct, even when released to their own people (Hubbard [probable author]: 1955: 41-42).

Again, techniques involving attempted attitude changes through severe stress became reality in the RPF, which Hubbard created less than five years after publishing an article on brainwashing that contained Ridgway's comments about nervous breakdowns. Organizational Forerunners to the RPF

During the very period when Hubbard wrote about brainwashing in the late 1960s, he also established a number of formal structures within Scientology designed to both punish perceived deviants whose job performances were deficient and train people for necessary jobs that the organization needed. Having been at sea from late 1967 (Atack, 1990: 176-177), Hubbard's punishment and training programs reflected the needs and conditions of maritime life. On January 4, 1968, for example, Hubbard created what he called the "Mud Box Brigade," which was a punishment assignment to any Sea Org member whom Hubbard determined was "a freeloader who is loafing on post and drifting with the wind" (quoted in Hubbard, 1976b: 341). The unsavory jobs involved cleaning the area where the ship's anchors dragged in mud (the mud boxes), along with "fuel lines, water lines, bilges, etc." (quoted in Hubbard, 1976b: 341). These were difficult, dirty, and somewhat dangerous assignments, but within a few years they would be taken over by inmates in the RPF's internal punishment program, the RPF's RPF.

Certainly by early 1969, Hubbard had in place two training projects--the Deck Project Force (DPF) and the Pursers Project Force (PPF), but he abolished them on March 25, 1969 (Hubbard, 1969). Apparently the DPF had trained Sea Org members on various ship duties, and the PPF presumably trained people in areas of ship finance and supply (see Hubbard, 1976b: 429). Likewise, some time before early April, 1972, Hubbard had a training program for household services called the Stewards Project Force (SPF [Hubbard, 1972a; 1976b: 501]). He also had a program called the Estates Project Force (EPF), which (as we must reconstruct from a later document), did such work as painting and sweeping (Hubbard, 1977: 1). Until the advent of the RPF, the EPF also received Sea Org members for (what Scientology called) "retreading." These

staff needed constant supervision, were making obvious problems, or were performing their jobs without enthusiasm (i.e., were suffering from "robotism" [Boards of Directors of the Churches of Scientology, 1977: 1]).

Apparently, however, Hubbard reinstituted the DPF, because by early 1972 it had a function beyond mere training. In addition to new recruits, the DPF received Sea Org members who were questioning authority. In the peculiar logic and language of Scientology, these people had "interiorized." That is to say, "the person is finding counter-intention in the environment which coincides with his own (this is reasonableness), and his attention becomes directed to his own counter-intention rather than to his objective" (Hubbard, 1976b: 437, quoting a Flag Order from September 23, 1969 [emphasis in original]). Said plainly, these people were questioning aspects of Sea Org life, and were finding things in the external world to reinforce their internal doubts. Consequently, the DPF was "to rehabilitate and exteriorize their attention" by getting them to do work assignments (Hubbard, 1972a; see 1976b: 133). Again said plainly, the intent of the program was to get a person to stop looking inward and (re)learn to accept the orders that the organization and its leaders demanded.

With this goal in mind, Hubbard imposed a system of rewards and punishments called "ethics" on people within the DPF that paralleled the system under which ordinary Sea Org members operated. Overseeing DPF ethics was a person who had the title, the "Deck Project Force Master-At-Arms [DPF MAA]," and he or she was responsible for making "ethics real to DPF members by removing counter-intention and other-intention from the area, and by getting each DPF member to crank out products with an honest uptrending statistic" (Hubbard, 1976b: 133; quoting a Flag Order from February 20, 1972). In other words, the MAA was to remove any ideas that were out of alignment with Scientology's goals through the use of the reward-and-punishment "ethics" system. Lateness, poor work performance, negative attitude, etc., were "out-ethics" actions that warranted the MAA to assign the offender to a lower ethics condition, which involved penalties on a gradient scale of severity. The offender had to work off these hours-long penalties or "amends" after the normal eight-to-ten hour work day (see Boards of Directors of the Churches of Scientology, 1973). Supposedly the completion of these amends taught people about the consequences of not showing continual increases in the output of their jobs, which supposedly was due to personal intentions that allegedly were out of harmony with Scientology's demands. In the DPF MAA's ethics assignments we can hear the echo of Hubbard's ideas about brainwashing, which he first discussed in 1955 and elaborated upon in the late 1960s. This staff member was to physically wear down people when trying to get them to renounce their private doubts, with the goal of getting them to completely embrace the collective goals of the organization.

Apparently the DPF's regime of hard work in harsh conditions continued into the early 1980s, since the account of Birgitta Dagnell about her time on the DPF in Denmark bears remarkable similarities to RPF accounts. According to her own statement, she was among the eighty-two former Guardian Office members sent into the Danish DPF by the new leadership of the Office of Special Affairs in 1982. The crowded conditions, the poor food, the exhausting hours, the assignments involving "cleaning toilets, corridors[,] and hotel rooms[,] or some painting and construction work" (Dagnell, 1997: 3) were the same for RPF inmates in other parts of the world. So were the "gang-bang sec checks" (which I discuss later) and the demand the "we 'recognized' that we really [were] that bad and evil" (Dagnell, 1997: 4), which she experienced during what she thought were going to be auditing sessions.

The Creation of the RPF

The RPF built directly upon the punitive, some might say, "brainwashing" role that the DPF had developed. Hubbard's motivations for establishing the program in January, 1974 included personal retaliation. Having gone ashore in late 1973 to ride his motorcycle on Tenerife in the Canary Islands, Hubbard took a spill and was injured. Recovering on board his flagship, Hubbard blamed the accident on unnamed crew members whom he believed were not carrying out his orders with sufficient diligence. In response, he ordered the creation of the RPF, with the intention of assigning to it anyone who had a "'counter-intention' to his orders or wishes..., along with all trouble-makers and back-sliders" (Miller, 1987: 321; see Kent interview with Pignotti, 1997: 6; Kent interview with Ernesto, 1997: 2).

Researchers do not have copies of the first three Flag Orders establishing the RPF, but do have the fourth one, which is a May 30, 1977 twice-revised version of a January 7, 1974 issue. Some time between its inception and late May, 1977, the RPF had assumed the punitive functions previously handled by the EPF and, presumably, the DPF. Sea Org members entered the RPF if they had dramatic indicator reads (called "rock-slams") while being counseled or "audited" on Scientology's confessional and lie detector machine called the e-meter (which gives readings about galvanic skin responses). Such indicator- or needle-jumps supposedly indicated "a hidden evil intention on the subject or question under discussion or auditing" (Hubbard, 1975: 357). Others received RPF assignments for poor production on their jobs or posts, poor personality indicators (presumably such as depression, grumbling, and doubting Hubbard or his techniques), and obvious trouble making (Boards of Directors of the Churches of Scientology, 1977: 1).

In considerable detail the RPF document laid out the framework of forcible confinement, physical and social maltreatment, intensive reindoctrination, and forced confessions that were (and are) central to the program's operation. Certain passages, for example, outlined the basic rules about forcible

confinement. Inmates could not leave the facility, and could travel between buildings only when they were accompanied by security guards (Boards of Directors of the Churches of Scientology, 1977: 10). Physical maltreatment occurred within the confines of sometimes demanding and dangerous work to which they were assigned. Specifically inmates had to carry out eleven maintenance functions--interior and exterior building cleaning; bathroom cleaning; general painting; internal building renovations; storage, passageway, and stairway cleaning; other "large scale" projects outside of sleeping, kitchen, or eating areas; "garage cleaning"; "elevator and elevator shaft cleaning"; engine room and boiler room cleaning; furniture set-ups for events; and "garbage disposal." They also could receive special assignments from specific Scientology personnel (Boards of Directors of the Churches of Scientology, 1977: 3). They were supposed to get seven hours sleep (Boards of Directors of the Churches of Scientology, 1977: 4), and they were allowed to call on a Scientology Medical Officer (who need not be a medical doctor) only if they were running a temperature or suffer an injury that requires medication or treatment (Boards of Directors of the Churches of Scientology, 1977: 6). Inmates were allowed to eat normal meals unless doing so deprived Sea Org members who were not RPFers (Boards of Directors of the Churches of Scientology, 1977: 9). Their use of bathrooms and showers was restricted (Boards of Directors of the Churches of Scientology, 1977: 11), and, "at RPF expense," inmates were allowed "[a] minimum number of circulating fans" in their study and sleeping areas "where there is NO other circulation of air easily available" (Boards of Directors of the Churches of Scientology, 1977: 11 [emphasis and capitals in original]). By adding together the time allotments that inmates had to perform various duties, we can deduce that each day people were supposed to receive seven hours sleep, study and audit for five hours, take one-half hour for each of three meals, spend thirty minutes a day on hygiene, and perform physical work for ten hours.

Policies involving social maltreatment were numerous. Inmates had to wear black or dark blue boilersuits (i.e., a type of heavy workclothes [Boards of Directors of the Churches of Scientology, 1977: 1]). They were barred from all normal social activities in the facility or the community (Boards of Directors of the Churches of Scientology, 1977: 2-3, 11), and any problems that this restriction might cause regarding non-Scientology commitments required an immediate report to superiors (Boards of Directors of the Churches of Scientology, 1977: 3). As the policy succinctly stated, "[a] member of the RPF is a member of the RPF and of nothing outside of it, till released" (Boards of Directors of the Churches of Scientology, 1977: 3). Depending upon inmates' stage of progress, pay was either one-quarter or one-half the normal Sea Org rates, "unless withheld or fined by a justice action" (Boards of Directors of the Churches of Scientology, 1977: 9; see 9 and 10). Inmates' sleeping quarters were

isolated from those of other Sea Org members, and were supposed to conform to fire, health, and safety regulations (Boards of Directors of the Churches of Scientology, 1977: 10). Inmates could not speak to regular Sea Org members, public Scientologists, or members of the public unless they had to in order to avoid "impoliteness" (Boards of Directors of the Churches of Scientology, 1977: 10). A spouse could have a conjugal visit with his or her partner one night a week in an authorized area provided that the person's RPF progress was satisfactory (Boards of Directors of the Churches of Scientology, 1977: 10). Likewise, spouses could visit with their partners or school-age children once daily during meals or at night if their progress was satisfactory and they refrained from discussing their RPF situations. Additional meal visits with pre-school children could be arranged (Boards of Directors of the Churches of Scientology, 1977: 10).

Intensive study of Hubbard's ideology was built into the program, with inmates allotted "5 hours study or auditing" daily (Boards of Directors of the Churches of Scientology, 1977: 4, see 6). Some evidence indicates that RPF inmates in the mid-1970s could complete the program in several months, but later accounts indicate that people frequently took over a year, and served RPF sentences more than once during their Scientology careers.

The Creation of the RPF's RPF

On April 24, 1974, a Flag Conditions Order established the RPF's RPF. This program received people who were on the RPF but not progressing satisfactorily, or who thought that their assignment to the RPF was humorous. As Hubbard reported in his "management technology" dictionary:

[t]he first RPF's RPF assignment was made because the person considered their [sic] RPF assignment amusing, an award [sic] and was therefore unable to recognize a need for redemption or any means to effect it. Until such time as the person recognized this need and of their [sic] own self-determinism requested to be included in the RPF redemption actions, the [RPF's RPF] restrictions applied" (Hubbard, 1975: 451 [emphasis in original]).

People on the RPF's RPF were segregated from the RPF inmates in their work assignments, eating, sleeping, roll-call, and other activities. They were not paid, did not receive auditing, were not to receive more than six hours sleep, and received triple ethics penalties for offenses. Reflecting the fact that the RPF's RPF began on a ship, inmates in the program were allowed to work only "on mud boxes in the E/R [engine room]." Moreover, they were allowed to communicate only with the person in charge of the RPF, and could "not join RPF fully until acceptable amends [were] made to all RPF members" (Hubbard, 1975: 451 [emphasis in original]).

Remarkably, this summary of the RPF's RPF is available in a Scientology dictionary to which members of the public have easy access. Not surprisingly, however, this same information does not

appear in Scientology's latest dissemination effort--its World Wide Web page. Sponsored by the Church of Scientology International, it makes no mention of the RPF's RPF and describes the RPF in terms that make it sound like a program of confidence-building and personal reinvigoration. According to the webpage, the RPF is "a second chance" for "Sea Org staff members who would otherwise be subject to dismissal for serious and/or continuous ecclesiastical violations"--an opportunity to experience "complete rehabilitation" for "personnel 'burn out'" (Church of Scientology International, 1996). "Participants" in the program receive "both study and religious counseling on a daily basis to address areas of difficulty in their personal lives." They also "work eight hours a day as a team on tasks which improve the facilities of the Church by which they are employed and improve teamwork and coordination among the participants. The work allows the individual to regain confidence in himself [sic] and the pride of accomplishment." Sea Org members who have gone through the program supposedly "attest to its enormous personal benefit, and express their appreciation for being able to avail themselves of redemption as opposed to dismissal" (Church of Scientology International, 1996). This public relations portrayal of the RPF stands in dramatic contrast to accounts about it that many former "participants" provide after they are no longer under the direct control of Scientology's policies that punish persons who criticize the organization or its doctrines. Each of the topics that the webpage mentions in a favorable light--study, religious counseling/auditing, 'eight hour' work days that rebuild confidence and pride, employment conditions and pay, and graduates' expressions of appreciation--receive very different interpretations by the former Sea Org members who provided the information for my RPF study.

RPF Consistencies and Variations

While the RPF stories that former members recount show remarkable consistencies over time and distance, variations occur with respect to facilities, personnel, and immediate organizational demands. Virtually all of the accounts, however, illustrate how the RPF attempted to control the bodies of its inmates through a variety of physical demands, abuses, and work obligations while at the same time it attempted to control their minds through extensive auditing, coursework, confessions, and success stories.

Assembling the affidavits, interviews, internet postings, and correspondence that I have collected, I have: two RPF accounts from the Apollo (the ship on which Hubbard lived from 1967 to 1975); seven from the Fort Harrison Hotel complex in Clearwater, Florida; one from La Quinta, California; one from Indio, California; four from Gilman Hot Springs, California (which informants sometimes called either "Hemet" after the nearby town or "Gold" according to the Scientology name); two from the Happy Valley camp near Gilman Hot Springs and the Soboba Indian Reserve; two from the Cedars complex in Los Angeles; one

from an unnamed ship docked near Los Angeles; one from East Grinstead, Sussex (England); and one from an RPF forerunner in Copenhagen, Denmark. Five informants went through the RPF's RPF--one on the Apollo; two in the Fort Harrison complex; and two in either Gilman Hot Springs or Happy Valley.

1. Forcible Confinement

Forcible confinement, which is one of the prerequisites for social scientists utilizing the brainwashing term, specifically occurred in nine RPF accounts and two RPF's RPF accounts. Indeed, seven informants had stories about their (sometimes successful) escape attempts from the program and the guards assigned to prevent them from doing so. These accounts stand in stark contrast to Scientology's insistence that "participation" in an RPF program is voluntary. For example, Dennis Erlich's experience in the RPF and the RPF's RPF at the Fort Harrison in late 1978 began with two "guards" arriving to escort him to the program. He did not resist them because "it was sort of implicit that [if] you wanna [sic] fight you're gonna [sic] get the shit kicked out of you...." (Kent Interview with Erlich, 1997: 9). On the other side of the continent at roughly the same period, Patti had "two big burly men" show up and say, "'you're going on the RPF...'" (Kent Interview with Patti, 1997: 19). Former member David Mayo told a more dramatic story in his affidavit, insisting that "[o]n August 29, 1982, David Miscavige, and others, acting on the orders of L. Ron Hubbard, kidnapped me and subsequently kept me captive and physically and mentally abused me for six months" (Mayo, 1994: 2-3).

Other people spoke about either being forcibly confined themselves (for example, Whitfield, 1989: 6) or seeing others who were. Former member-turned-critic, Dennis Erlich, joked about his RPF assignment, and, in accordance with Hubbard's policy, wound up in the RPF's RPF in Fort Harrison's basement. Guarded down there for ten days, Erlich states that he spent the first day or two "locked in a wired cage..." (Kent Interview with Erlich, 1997: 8). When Nefertiti (which is the presumed former member's alias) found herself in the RPF's RPF in the same basement a decade or so later, she met a woman (she claims) who was "in her thirties, feverish, [her] entire body poured with sweat [and] was wearing chains. She had a chain about twenty inches long linking her two ankles so she had to do small hasty steps" (Nefertiti, 1997: 3). Tonya Burden swore, "under pains and penalties of perjury" (Burden, 1980: 12) that she "personally observed a person chained to pipes in the boiler room in the Fort Harrison building for a period of weeks" (Burden, 1980: 10). Likewise, in an affidavit, Hana Whitfield swore that, while she was on the RPF in the Fort Harrison, Lyn Froyland was assigned to the RPF's RPF and "was chained to a pipe down there [in the basement] for weeks, under guard. She was taken meals and allowed toilet breaks, but no other hygiene" (Whitfield, 1994: 42).

The most extensive account of confinement comes from former member Andre Tabayoyon, who spoke about the Gilman Hot Springs

base (on which RPF members worked) having a security system that included "the perimeter fence, the ultra razor barriers, the lighting of the perimeter fence, electronic monitors, the concealed microphones, the ground sensors, the motion sensors and hidden cameras which were installed all over the area--even outside the base" (Tabayoyon, 1994: 8). Tabayoyon spoke about working on the base's security system in 1991, but back in January, 1983, unwilling RPF victim Julie Mayo found her freedom blocked by a guarded fence at Gilman Hot Springs. Taking what may have been the only escape option she had, Julie Mayo waited one morning until the guard opened the gate to allow someone to walk across the street for breakfast, and slipped out to the road, unnoticed, before it closed (J. Mayo, 1996: 8-9).

Other escape stories indicate that RPF victims were, essentially, imprisoned in situations where they had not given consent (much less informed consent) for their captors to hold them. Vicki Azanaran, for example, "and two other victims escaped from Happy Valley onto the Sobo[b]a Indian Reservation where they were pursued on motorcycles by guards of Happy Valley. Vicki and the other victims were rescued by residents of the reservation who picked them up in a pick-up truck and spirited them to a motel in the City of Hemet" (Azanaran and Azanaran, 1988: 12). Former member Pat escaped by using several elaborate ruses. First, she concocted a story that convinced guards to allow her to use the telephone. Then she called a non-Scientology friend and gave explicit instructions about where her friend should be the next night (Kent Interview with Pat, 1997b: 3). The next night, she concocted a second story that managed to get her near to the street where her friend was waiting. Manipulating the guard who was with her, Pat managed to get enough distance from him so that she got inside the car:

slammed the door shut and said, 'Go!.' [My friend] hit the door locks and [the friend] stepped on the gas.... It was an awful, awful time, and there I was in this car not knowing where I was going, forty cents in my purse.... But I couldn't be there anymore; I couldn't be there another minute. I couldn't handle another second of the degradation (Kent Interview with Pat, 1997b: 4).

As the car roared away, Scientologists who witnessed her escape screamed at her.

Other escape accounts exist, all of them indicating that people were in the RPF program against their wills. Nevertheless, some people allowed themselves to be talked back into the program (or into a related program) by Scientology retrieval teams sent out to bring them back. As Anne Rosenblum recounted, for example, she escaped the RPF from the Fort Harrison in Clearwater by slipping out of sick bay and jumping over a wall (Rosenblum, n.d.: 6). She fled to the house of a Scientology friend who, apparently, informed the organization, and (along with four Scientology 'escorts') convinced her to return and "route out" of the Sea Org through standard Scientology procedures. In a

confused emotional state, she returned to the Fort Harrison and remained under guard as she went through a number of Scientology hearings in preparation for the organization releasing her. Hubbard happened to offer a general amnesty to RPFers at this moment, and she and several others accepted the offer. She indicated that the organization ran her through security checks "concerning whether we were taking any Scientology data with us, what our intentions were when we left etc." Scientologists searched her luggage for any items that she might have been trying to remove, then had her sign an affidavit that listed all of her alleged crimes "of this lifetime," which the organization culled from her supposedly confidential auditing files (Rosenblum, n.d.: 7).

Robert Vaughn Young informed me that he: escaped down the river bed one night. Planned it for a long time. Got into Hemet and they [i.e., members of Scientology retrieval team] found me there at a motel. And this is where you get into the power of the organization--and without anyone laying a hand on me, I was convinced to go back to the RPF (Kent Interview with Young, 1994: 22).

On a second escape attempt, however, he was not so lucky--he got caught (Kent Interview with Young, 1994: 22). Apparently Hana Whitfield also escaped the RPF (in Clearwater), but she, too, re-entered after pressure from Scientologists who found her (Whitfield, 1989: 7).

Current Scientology opponent Lawrence (Larry) Wollersheim also was caught trying to escape from the RPF operating on a ship (presumably in the Los Angeles area) in 1974. As a court decision in his favour determined:

[u]ltimately, Wollersheim felt he could bear the [RPF] regime no longer. He attempted to escape from the ship because as he testified later: 'I was dying and losing my mind.' But his escape effort was discovered. Several Scientology members seized Wollersheim and held him captive. They released him only when he agreed to remain and continue with the auditing and other 'religious practices' taking place on the vessel (California Court of Appeal, 1989: 9274).

The court used this example as "evidence" that Wollersheim "accepted some of his auditing under threat of physical coercion" (California Court of Appeal, 1989: 9274). While it would be unwise to generalize from these accounts and suggest that all inmates in RPF programs were in them involuntarily, certainly some of them had not consented or chosen to be there.

2. Accounts of Physical Maltreatment

Undoubtedly the physical maltreatment that many people experienced in various RPF programs was a factor in their desire to escape. I hesitate to say that all people experienced physical maltreatment, since one informant who went through the RPF at the Fort Harrison Hotel said that the daily schedule "was not bothersome" and that he "got enough sleep" (Kent Interview

with Ernesto, 1997: 16, 17). He admitted, however, that he was not assigned the heavy physical work, but only cleaned and emptied garbage (Kent Interview with Ernesto, 1997: 16). Other people, however, experienced a wide range of (what they considered to be) physical abuses.

A. Excessive Exercise--The Running Program

Forced running was a universal aspect in the RPF, but leaders also used it as a specific punishment. According to a person who was on the Apollo, Hubbard devised the "running program" as a punishment against a member whom he thought "needed some discipline." He ordered the member "to do fifty laps around the prom[enade] deck. [The member] did about twenty and declared [that] he had done fifty. I remember distinctly, and he got away with it" (Kent Interview with Ernesto, 1997: 5). With the advent of the RPF, running quickly became a standard punishment.

The location of the running punishment, of course, varied according to the location of the RPF program. Monica Pignotti, who was in the RPF on the Apollo, wrote a particularly clear description of the running punishment that she experienced in the early months of 1975:

We had to scrub down the entire bathroom, including all the bulkheads (walls) and ceilings. After we cleaned an area, it had to pass a white glove inspection. If the glove came up dirty, the person who cleaned the area had to run laps from bow to stern of the ship (about 1/5 of a mile each). One time, when my senior wasn't satisfied with the way I cleaned a bathroom, she ordered me to 'take a lap.' I protested because I thought she was being unfair and her reply was, 'Don't Q&A with me. Take two laps.' I objected again and she said, 'Take four laps.' This went on until I was up to about 10 laps, which I eventually had to do (Pignotti, 1989: 23).

Using the "technical" language of Scientology, Pignotti had been put on "rocks and shoals"--penalties for Sea Org members (Hubbard, 1976b: 449).

From her Fort Harrison RPF experience, Anne Rosenblum indicated that the "rocks and shoals" punishments often included sit-ups and push-ups in addition to running laps "up and down the garage ramp" (Rosenblum, n. d.: 2). Dennis Erlich also reported "having to run up and down the parking structure..." (Kent Interview with Erlich, 1997: 16). In the Cedars complex in Los Angeles, rocks and shoals involved "running the stairwells" or taking "laps around the entire complex" (Kent Interview with Pat, 1997: 27). The most difficult running punishments apparently took place at either the Gilman Hot Springs or Happy Valley RPF programs, where formerly high ranking Sea Org members had to run around either a tree or a pole for twelve hours a day. Julie Mayo indicated that she "was put on a running program for 12 hours a day, 7 days a week, and made to run around a tree in all types of extreme desert conditions" (J. Mayo, 1996: 7). Her husband, David, reported that he "was forced to run around a tree in the desert in temperatures of up to 110 degrees for 12 hours a

day, 7 days a week for 3 months..." (D. Mayo, 1994: 3). Vicki Aznaran made a similar claim about having "to run around an orange telephone pole from 7:00 a.m. until 9:30 p.m. in the evening, with 10 minute rests every one-half hour, and 30 minute breaks for lunch and dinner" (Aznaran and Aznaran, 1988: 9).

B. Physically Demanding and Tiring Chores

Labour was a central aspect to RPF programs, usually involving maintenance and renovation. On the Apollo, RPF inmates performed a number of cleaning jobs--scrapping and painting; scrubbing decks; etc. (Kent Interview with Dale, 1997: 6). While on the RPF's RPF, Monica Pignotti was made "to go down and clean muck from the bilges. That was my job all day long.... [A]nd I had to clean all this sludge out and then paint--paint it.... I was on it for five days..." (Kent Interview with Pignotti, 1997: 26).

While an account from the RPF in East Grinstead spoke about "chipping the crust off cooker parts or painting stones" (Forde, n. d.: 3), activities such as garbage disposal (Royal Courts of Justice, 1984: 27), and cleaning bathrooms (Pignotti, 1989: 23; Rosenblum, n. d.: 1), hallways (Rosenblum, n. d.: 1) and stairways (Nefertiti, 1997: 10) was much more common. Vicki Aznaran reportedly dug ditches (Aznaran and Aznaran, 1988: 11), and Pignotti was part of an RPF team that did photo shoots for pictures that appeared in the 1978 publication, *What is Scientology?* (Church of Scientology of California, 1978). Gerry Armstrong assembled course packs (Superior Court of the State of California, 1984: 1462), but he also performed another common RPF assignment--building renovation.

In the period around April, 1979, Armstrong worked on a team that was renovating a house that was to be the dwelling of L. Ron Hubbard (Superior Court of the State of California, 1984: 1475). Andre Tabayoyon (1994: 24 [section # 116-117, 120-122]) spoke about RPF "slave labor" (as he called it) building and renovating numerous dwellings and buildings used by Scientology leaders and their movie star friends. The most dramatic renovation accounts came from Pat, whose RPF team (she stated) was involved in major building renovations in southern California in the 1970s:

the pressure kept mounting every day with the renovations. Every day that passed there was greater pressure to get renovations done...until it got to the point that we were--and I swear to God this is true--we worked thirty hours on, three hours off. We worked shifts of thirty hours at a time.

....

[W]e would work so many hours, Steve, that I, I remember [that] I would pass people and I--and we'd be in a dark room with a screw gun laying drywall in a completely dark room and I would pass and I would stop because I saw sparks flying off this thing and I'd go, 'hey, what's going on?,' and the person would just look at me with this dazed look saying, 'Oh, I, I don't know. I'm just looking at the sparks.' I mean, we were delusional we were so tired. I

remember trying to construct a sentence and being unable to do so. You know, saying--knowing that I had to say, 'I need that screw driver,' and saying, 'I need that fence for the sandwich that isn't purple.' [...] I was unable to be at all coherent (Kent Interview with Pat, 1997: 25, 26).

Pat's thirty hour work shifts were unusual--Robert Vaughn Young spoke about twelve hour work days (Kent Interview with Young, 1994: 18)--but Monica Pignotti reported that once she had to work "for thirty-six hours straight with no sleep" because Hubbard had ordered the whole ship to be cleaned (Kent Interview with Pignotti, 1997: 14).

C. Poor Diet

The heavy workload should have warranted a high calorie diet, but several of the former RPF inmates complained about the quality of the food. Despite what Tonya Burden identified as an 18 hour workday, she indicated that often she "received only 'rice and beans' and water" for her meals (Burden, 1980: 10). Apparently Nefertiti ate what she called "soups or pigswills," only occasionally flavoured with milk (Nefertiti, 1997: 9). Pat complained that "we were fed really dreadful food," which she went on to clarify as "very institutional, very poorly prepared," and which included "scraps and what was left over" (Kent Interview with Patti, 1997a: 24). Pignotti reported the common refrain that her RPF cohort ate after the rest of the staff was finished, but the leftovers that they ate came from the kitchen and not items found on people's plates (Kent Interview with Pignotti, 1997: 14; see Kent Interview with Dale, 1997: 6). Poor diet may have been a contributing factor to Larry Wollersheim loss of fifteen pounds during his six weeks on the RPF aboard a ship (California Court of Appeal, 1989: 9269).

D. Issues of Hygiene and Medical Care

Worn down by a rigorous work schedule, and possibly weakened further by marginal diets, RPF members were especially susceptible to illness. On the Apollo, RPF members apparently had trouble keeping their clothes dry (Kent Interview with Dale, 1997:6). On land, many RPF victims probably had a similar problem, but now the dampness was the result of perspiration from wearing work clothes in hot climates. Hana Whitfield, for example, complained about having to wear heavy jumpsuits or boilersuits in the hot Florida weather (Whitfield, 1989: 5-6). Despite the obvious need for baths or showers, Whitfield revealed that "[w]e were not allowed to shower longer than 30 seconds" (Whitfield, 1989: 6). While in the RPF, Nefertiti saw firsthand the problems that excessive sweating could cause women, and she included a pertinent story in her recollection of her forcible confinement experience:

We all suffered from heavy sweating. I recall this young woman suffering from an important [sic] infection which had been developing under her breasts. Instead of healing, the wound had been expanding to such a degree that purulent blisters had reached her navel (Nefertiti, 1997: 9).

Nefertiti was not the only former member to report having seen a woman on the RPF with a severe skin problem--former member Lori Taverna told city officials in Clearwater, Florida that she "saw a few people who looked very sick[, including o]ne [who] had sores all over her body, open sores" (City of Clearwater Commission Hearings, 1982: 2-151). Another medical and hygienic problem that women faced was "not having enough cash to buy a box of Tampax [tampons]" (Nefertiti, 1997: 11).

People faced health problems in a variety of areas. David Mayo, for example, claimed that "I was refused medical and dental treatment" while on the RPF, and "after escaping captivity I lost six teeth and required thousands of dollars of dental work to save the rest of my teeth" (Mayo, 1994: 3). Most seriously, Andre Tabayoyon recalled working on "dangerous machinery" while on the RPF's RPF and seeing a distressed co-worker "thrust his finger into the machine which cut his finger off" (Tabayoyon, 1994: 10).

E. Sleeping Conditions

Beyond these real and immediate issues related to hygiene and medical care, many people spoke about issues related to sleep. They complained (in retrospect) about their sleeping conditions--the conditions of the mattresses; ventilation in the rooms; crowded conditions; and inappropriate sleeping areas. From different times and different locations, people spoke about the deplorable condition of the mattresses on which they had to sleep. Remembering the circumstances for sleeping on the Apollo, Dale recounted that "we were given mattresses but the mattresses we were given were old, filthy mattresses that... had to be cleaned up.... A lot of them smelled..." (Kent Interview with Dale, 1997: 6). Reflecting on her period of grueling work shifts, Pat recalled that "when our thirty hours were up we'd get to sleep. We would go to the roof of one of the buildings where it was cold and there were these damp, disgusting mattresses that we would just fall onto and sleep" (Kent Interview with Pat, 1997a: 26).

Mattresses frequently rested either on the ground or the floor. When, for example, Robert Vaughn Young was in isolation in a converted chicken coop on the Gilman Hot Springs property, he indicated that "there were some old mattresses that g[o]t thrown down on the floor. You know, you talk about a crash pad..." (Kent Interview with Young, 1994: 20; see A. Tabayoyon, 1994: 9 [para. # 35]). Adelle Hartwell was at one of the Indio facilities at the same time that her daughter was there in the RPF. Someone in charge of the RPF (presumably) put the mattresses of the RPF people outside, and around the same time the daughter fell ill. "During the heat of the day I would see her moving her mattress from one shady spot to another to try and keep out of the blazing sun and 115 degree heat. I have never seen illness treated this way" (Hartwell, n.d.: 3). Like the sick daughter, Vicki Aznaran may have meant that her mattress was not on a frame when she stated that she and others were made to "sleep on the ground" (Aznaran and Aznaran, 1988: 11). Certainly accounts from

the Fort Harrison RPF indicated that people slept on mattresses strewn on the floor, usually in cramped, poorly ventilated rooms (Armstrong, 1982: 3; Nefertiti, 1997: 12; Rosenblum, n. d.: 3; Whitfield, 1989: 5). Ventilation was so bad the first time that Monica Pignotti was on the Apollo's RPF that "we slept out on the decks on towels because it was so stuffy down there [in the RPF] and it was really horrendous conditions..." (Kent Interview with Pignotti, 1997: 18).

Even when RPF members had beds or bunks, significant problems remained. While in an RPF program on a ship, "Wollersheim and others were forced to sleep in the ship's hold. A total of thirty people were stacked nine high in the hold without proper ventilation" (California Court of Appeal, 1989: 9274). At the Fort Harrison, Dennis Erlich and other RPF inmates slept in bunks on the third floor of the outdoor parking structure that adjoins the hotel, so they inhaled exhaust fumes from cars (Kent Interview with Erlich, 1997: 3). Apparently the women's sleeping facilities were nearby, because Anne Rosenblum wrote that:

[i]n December, 1978, we were moved to a storage area in the garage. It was a partly wooden, partly cement, enclosure built against one of the garage walls. It was built to be a storage area, but as the RPF grew so large, it was made the RPF's girl's sleeping area. Wooden bunks were built, that were about 1/2 to 1/3 the size of a regular twin bed. The bunks were built 3 and 4 stacks high, and were put in there side-by-side. Our 'mattresses' were pieces of foam cut to fit the bunks. It was like crawling into a hole to get into bed. You couldn't even sit up because of the bunk above you, and it was difficult to try to turn over because they weren't wide enough. The worst problem was that being in the garage, we inhaled all the car fumes when cars would go through, in addition to the noise of cars that [people taking courses] and staff would make driving in and out (Rosenblum, n. d.: 3).

It seems remarkable that health, zoning, or safety inspectors never discovered these inappropriate sleeping quarters at the Fort Harrison, but Hana Whitfield explained that "all RPFers were practiced and skilled in transforming their normal RPF sleeping areas into what looked like a regular furniture storage space, and doing so in a very short period of time" (Whitfield, 1989: 6).

3. Social Maltreatment

The line between physical maltreatment and social maltreatment was not always clear, yet certain activities involving such occurrences as degradations, restrictions in verbal and written communication, and very low pay seem distinctive enough to warrant mention. RPF degradations were many. They included having to wear jumpsuits or boiler suits (Kent Interview with Pat, 1997: 22; Kent Interview with Young, 1994: 18; Superior Court of the State of California, 1984: 1432;

Whitfield, 1989: 5), and having to refer to everyone as "sir," (Rosenblum, n. d.: 2; Whitfield, 1989: 5), and RPFers were prohibited from walking--running only (Rosenblum, n. d.: 1).

Many people indicated that their ability to communicate with others was severely curtailed, although they expressed the restrictions with slightly different emphases. Dale seemed to capture the basic restriction when he informed me that "[y]ou could not talk to anybody [who] was not on the RPF unless you were spoken to..." (Kent Interview with Dale, 1997: 5; see Kent Interview with Pat, 1997a: 23). Englishman Peter Ford stated that someone on the RPF was "allowed to speak with only 1 person at all (the MAA [or Master-at-Arms]," who directly oversaw the program (Ford, n. d.: 3; see Pignotti, 1989: 24). Julie Mayo insisted that she "was not allowed to talk to the rest of the staff or even make a phone call" (J. Mayo, 1996: 8).

These restrictions on communicating included one's mail and telephone calls. Gerry Armstrong's accounts of RPF surveillance and communication censure were amplified by Robert Vaughn Young, who wrote on the internet that he underwent interrogations over the contents of letters exchanged with his wife while he was incarcerated in the RPF program (Armstrong in Young, 1997: 1-2; see S. Young, 1994: 29). In an affidavit, David Mayo swore that "I was not permitted to make or receive phone calls and all letters I wrote were read by Scientology security guards" (Mayo 1994: 3). Dramatically, Nefertiti recounted meeting a woman on the RPF's RPF who was there because "she had sent a letter to her husband--[a] member of the cult[--] revealing some details about the RPF. One is not supposed to talk about the gulag. She had violated the gulag's law of silence" (Nefertiti, 1997: 4).

Communication restrictions extended to include the media. While on the RPF, people were not allowed to listen to the radio, watch television, or read magazines and newspapers (Kent Interview with Pat, 1997: 23; Rosenblum, n. d.: 2).

For all of the deprivations that RPF members suffered, they still received almost no salary. During his 1977 period in the RPF, for example, Armstrong indicated that he received about \$4.30 a week for a hundred or more hours work (Superior Court of the State of California, 1984: 1463). Likewise, "[i]n the RPF," Robert Vaughn Young revealed, "I got paid five dollars a week for fourteen months" (Kent Interview with Young, 1994: 24), which was the same amount the Pignotti collected (Kent Interview with Pignotti, 1997: 17). Anne Rosenblum only got \$4.00 a week (Rosenblum, n. d.: 3).

4. Intensive Study of Ideology

When neither punishments nor pressing work assignments interfered with study time, RPF inmates spent up to five hours a day studying Scientology doctrines and participating in numerous auditing and security checking sessions. Each person worked with a co-auditor, and one had to complete the RPF's auditing course as well as successfully audit one's partner through it (Rosenblum, n. d.: 2). It seems likely that the purpose of this

intense study was to infuse the person with Hubbard's teaching at the same time that an other aspect of the RPF was operating--forced confessions. That is to say, as one was studying what Scientology considers to be the uncompromising truth, he or she also was receiving continuous messages (through the forced confessions) that the individual was weak, guilty, and completely dependent upon the leader's doctrines for salvation (see Kent, 1994).

The required study items and auditing actions became highly structured, with a 1980 checklist of "RPF Graduation Requirements" listing seven pages of courses, readings, educational demonstrations, essays, auditing, and confessions that inmates had to complete successfully in order to "graduate" from the program (Boards of Directors of the Churches of Scientology, 1980: 1-7). The checklist for just one course, for example, required that RPF inmates read ninety-two Hubbard bulletins, orders, and miscellaneous writings; perform ten demonstrations of concepts; listen to six tapes; perform twenty-six drills; write two essays; participate in ten hours of auditing; plus complete three additional auditing assignments (Board of Directors of the Churches of Scientology, 1974).

5. Forced Confessions

An intimate aspect of the ideological re-exposure, therefore, involved RPF inmates repeatedly confessing to alleged sins, crimes, and evil intentions (see Kent Interview with Dale, 1977: 9). According to Monica Pignotti, these forced confessions took two forms. First, while "on" the e-meter:

[t]hey had prepared lists that they called security checks where they would ask you all kinds of questions on every possible thing a person could have done wrong--any possible thing you could think of in your life or... against the organization. 'Have you ever stolen anything? Have you ever had any unkind thoughts about L. Ron Hubbard? About Mary Sue Hubbard? About Scientology?.... Have you ever committed murder?' Just a whole list where anything [might] read on the e-meter. And the auditor would say, 'What are you thinking of right now?' and you would have to answer the question until... the meter didn't read anymore...

[T]he other one that they did a lot of was repetitive commands: 'What have you done? what have you withheld? What have you done? What have you...' it was said over and over and over (Kent Interview with Pignotti, 1997: 15; see Supreme Court of the State of California, 1984: 1487-1490, see 2545-2546).

People confessed to all manner of crimes, including ones allegedly from past lives (Nefertiti, 1997: 12). In essence, Scientology's supposedly "religious" tool--the e-meter--became the functional equivalent of a secular lie detector (see Kent Interview with Erlich, 1997: 11):

An important practical distinction between auditing and sec-checking is that Scientology does not consider information

revealed in sec-checks to be confidential material (as auditing information is supposed to be). Consequently, RPF inmates likely realized that this information could be used against them at some future time. At least two people, however, who had been though the RPF stated that people on or associated with the RPF were in fact culling people's auditing (or 'pc' or 'pre-clear') files for crimes that people had to address (Kent Interview with Pat, 1997: 29; Supreme Court of the State of California, 1984: 2714).

Sec-checking could, and often did, become very intense and unnerving. Before high-ranking Scientology leaders sent Stacy Young to the RPF, they subjected her to what is called a "gang-bang sec check" involving two or more people angrily and quickly firing questions at someone in an attempt to break down the person emotionally:

Two very large, strong men..., locked me in a room and interrogated me for hours, During the interrogation, they screamed and swore at me. They accused me of all sorts of crimes against Scientology. They demanded that I confess to being an enemy agent (S. Young, 1994: 28).

Julie Mayo appears to have experienced gang-bang sec checks, but after she already was in the RPF program. RPF staff pulled in Julie and fifteen other people late one night, and sat her: opposite from the three who faced me. I was told that unless I confessed to working for the IRS, the FBI, or other government agency, I was going to: A) be sent to jail; B) lose my eternity; C) be banned from [Scientology] tech[nology] lines forever. When I said [that] I didn't work for a government agency, I was told that they might go lighter on me if I confessed to supplying [a person] with a mailing list. I said [that] I hadn't done that either, so [I] was told to go think about it and write my confession (J. Mayo, 1996: 7).

Presumably her husband, David, also went through similar grillings, since he indicated that "I was often awakened during the night and interrogated..." (D. Mayo, 1994: 3).

6. Success Stories

For inmates attempting to complete the program, among the final, obligatory activities that they must do is write success stories about how the RPF transformed their lives. For years prior to the RPF program, Hubbard had in place an organizational requirement that Scientologists were required to provide glowing accounts of Scientology's benefits, so the requirement that inmates had to produce them about the RPF merely was following policy. With public relations in mind, Hubbard wrote in 1968:

[f]or purposes of distribution of Scientology and getting it into the hands of the millions, standard tech producing results and being broadcast by word of mouth by pcs [pre-clears--people below a certain level of courses] and students is one of the best programmes. People who have not had the results or wins are not likely to assist distribution and indeed are a liability (Hubbard, 1968: 140)

[emphasis in original]). Hubbard also realized that "win" stories provided invaluable information about how people felt concerning their Scientology experiences, so he wrote that "Success is the final police point of an org. All [s]tudents and pcs must go to Success before leaving an org even on a "leave of absence" (Hubbard, 1968: 140 [emphasis in original]). Success stories about RPF "wins," therefore, simply followed policy, and they also may have provided some protection in the future if former RPFers became critical of their incarceration in the program.

Far less extensive in content or design than the final confessions that Chinese and Western victims of thought reform programs had to write for their "re-educators" in the late 1940s and early 1950s (see Lifton, 1961: 266-273, 473-484), the RPF success stories nevertheless appeared to follow an outline or formula. In them, "graduating" RPFers had to acknowledge their alleged previous deficiencies that justified their RPF assignments, praise the quality of Scientology instruction and training that they have received in the RPF, identify how this instruction and training combined with other aspects of the RPF to positively transform their lives, and thank Hubbard and the organization for their RPF experiences.

A published RPF "success" story from March, 1977, illustrates the formula. A person identified only as "B.G. proclaimed that:

[t]he RPF is the most fantastic process LRH [L.Ron Hubbard] has yet devised. It's pure, no holds barred Scientology. And it's for real. When I walked in the door here several months ago the only thing I knew for certain was that there was no hope. I had totally and utterly betrayed LRH and all SO [Sea Org] [m]embers and Scientologists everywhere. And in so doing [I] had sold my future down the drain.

..... I found that, as an RPFer I had only two possible courses of action--Win, or die in the attempt, and I had 50 or so tough, dedicated, confront anything fellows making sure I didn't die. While I've been here I've received the best auditing and training I've ever had....

I'm about to graduate now. The greatest single win I've ever had in my existence I got right here. I know [that] Scientology works. I have total certainty on my ability to handle myself and others and on other's ability to handle me and others using LRH's Tech. And I know that the RPF is where it all comes together. It's where the RPF makes it and that's something. Thanks to LRH I have a future--and a damn bright one too! (Sea Organization, 1977: [5]).

Having followed the formula--(acknowledging pre-RPF crisis, praising RPF training and techniques, glorifying Hubbard, and claiming a successful completion of the program), this person probably was released from the RPF within a matter of days.

The Impact on Some Scientologists Who Saw the RPF in Operation

Two very revealing accounts exist by people who were

Scientologists and had brief but disturbing encounters with RPF inmates. Their accounts provide some indications of the cumulative impact the brainwashing and confinement efforts had on the people who experienced them. One account was from former member Joe Cisar, who:

stumbled into the RPF's RPF one time in the tunnels below the Cedars complex in L.A. There w[ere] about a dozen people who apparently had been sleeping in these tiny rooms. (There were a couple of blankets on the floor.) Both men and women [were down there]. A man was cutting a woman's pant leg with a knife while she was wearing the pants, and he had sliced her foot. Blood was running down her ankle onto her foot and was puddling on the floor. She looked up at me and gave me... what I would consider to be an insane smile and said, 'I caused my foot to be in the way of his knife.' Two or three of the people who were crouching and laying about on the floor looked up at me as if it were some kind of wonderful joke. I backed out the way I came in. One of Scientology's big promotion schemes is to tell people that they need to be 'at cause.' These people weren't at cause over anything[. T]hey had degenerated back to the Middle Ages.

That's what I knew about the RPF when the Scientology ethics officer told me to report down there for indefinite duty. I told her [that] they could get me down there, but I'd put several of them in the hospital first, and reminded her that I was a Viet Nam veteran. I was one of the few Sea Org members who had managed to hang onto [his or her] car, and I left that night (Cisar, 1997: 3).

One wonders what would have happened to Cisar had he not seen the conditions of these inmates prior to his own RPF assignment.

The other dramatic glimpse into RPF life came from Ann Bailey, who was involved in moving Scientology into its newly acquired former hospital (called the Cedars of Lebanon complex) in the summer of 1978. After a move that taxed the levels of her physical endurance, she found herself assigned to guard the secret, upper level theological (Operating Thetan or OT) documents that were in a room without a door. They were in the former hospital's old morgue, and she sat there for hours amidst the lingering "smell of death and chemicals and dissection" (Bailey, n. d.: 60). Then:

[s]uddenly during the third hour I was aware of shadows in the corridor beyond me. [T]hey were people. Slowly I realized that an entire group of people lived and worked down there. I was so tired [that] it took me a long time to realize who they were. Then it hit me. [They were t]he Cedars RPF. They lived and worked down in this stinkhole. This was their Org. Then I really found out what had happened to them. Filthy, tired, skeletons appeared before me and started begging to see the OT folders. I thought I looked bad, but I looked beautiful compared to them. They

crowded around me pushing and shoving, then the mood turned ugly. They started hitting each other to get into the room behind me. I realized what had happened. They had been totally broken. They were animals, not humans. I saw four of my friends, one a Class Nine OT, fighting to get by me. They were punching each other in the face, pulling hair, kicking. And way down in this cellar no one could hear them, no one cared.

Someone suddenly hit me hard. I realized [that] they were turning their anger on me[. T]hey would beat me up to get the folders. I guess in periods of deep stress we all go a little insane--[s]urvival of the fittest. From somewhere in my tired brain, strength came. I stood up with all my TR's [i.e., Scientology communication drills] as in as they had ever been, [and] all my training on control of groups came back. 'Friends,' I said. 'Believe me, I am your friend. By some strange fate I am not with you on the RPF. But believe me if you don't get out of here right now, I know [that] you will be punished. Go now before it's too late.' And they ran away into the dark. When I sat down I was trembling all over. Because the real intent of my message had been for them to get out of the hospital. Leave Cedars. But I don't think any of them got the message (Bailey, n. d.: 61-62).

She was out of Sea Org in a week.

Conclusion: Brainwashing as a Practice in Scientology and a Concept in Sociology

Taken together, the effect of these actions and pressures on people who experience them can be profound. In environments where the Scientology organization and its leadership attain totalistic control over RPF inmates, researchers should expect to see a high degree of conformity among recent RPF graduates. Certainly Monica Pignotti was correct when she concluded that "[t]he lesson we were to learn on the RPF was to obey orders without question, regardless of how we felt about it or who was giving the orders" (Pignotti, 1989: 23). Pat's conclusion was even crisper when she answered that the RPF's purpose was "just re-indoctrination--just to break you down" (Kent Interview with Pat, 1997b: 5). I go one step further and add that the final intent of the RPF was (and is) to mold people into the closed ideology of Scientology, where members identify their goals and their strategies with those of the organization. Working in conjunction with forced confinement and various forms of physical and social maltreatment, the intensive study of ideology combines with obligatory confessions to severely weaken people's own moral structures and the values that represent them. When successful, therefore, Scientology's brainwashing leads people to accept the moral code and ideational model of founder L. Ron Hubbard. As Gerry Armstrong realized, people on the RPF necessarily "bec[a]me so compliant that they thanked their punishers for the punishment, and wrote... success stor[ies] (to be used against them in the future if they ever

realize [that] they had been abused and sought redress for that abuse)" (Armstrong in Young, 1997: 5). Indeed, writing such a story was a prerequisite for completing the RPF program.

The implications of this study are modest but significant for sociology (especially the sociology of religion) but much greater for contemporary political and legal discussions. Social scientists need not alter their definition of brainwashing, but should simply acknowledge that at least one contemporary ideological organization utilizes brainwashing in an attempt to retain its members. While this study cannot answer crucial questions about the long term implications for people who have been through this particular brainwashing program (compare Schein, 1961: 284), no doubt exists that Scientology's founder gave considerable thought to brainwashing techniques and imposed them on those of his followers whom he believed were harbouring thoughts or performing actions against him or the organization. The "brainwashing" term, therefore, has validity within some social science discourse.

Contrary to the judgements of some social scientists, the term also has validity in the discourse of politics and legal debates, in this case about human rights in the context of Scientology's non-religious status in Germany and America's granting the organization tax-exempt status. German politicians who oppose Scientology's quest for religious standing are well versed in the existence of the RPF programs (see Kent, 1997), and they are aware that the program still exists (Hessische Allgemeine, 1997). Without question the RPF's operation violates a number of human rights statutes, probably involving such topics as freedom of religion and conscience, labour laws, arbitrary arrest, forcible confinement, and protection of the dignity of the human being (Kent, 1997: 39). The human right issues become even more significant if the accounts of children and teenagers on RPF programs are true (Jebson, 1997; Kent Interview with Dale, 1997: 4, 16; Kent Interview with Pat, 1997a: 32; Kent Interview with Pignotti, 1997: 30). Ironically, as the United States Department of State heightens its criticism against Germany's handling of the Scientology affair, at least three of these abusive programs continue to operate on American soil.

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25

FILED

JUN 22 1984
Dist. Ct. Clerk

Chas. M. Hall
BY EDDIE M. HALL, CLERK

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY OF CALIFORNIA,

Plaintiff,

vs.

GERALD ARMSTRONG,

Defendant.

MARY SUE HUBBARD,

Intervenor.

No. C 120153

MEMORANDUM OF
INTENDED DECISION

In this matter heretofore taken under submission, the Court announces its intended decision as follows:

As to the tort causes of action, plaintiff, and plaintiff in intervention are to take nothing, and defendant is entitled to Judgment and costs.

As to the equitable actions, the court finds that neither plaintiff has clean hands, and that at least as of this time, are not entitled to the immediate return of any document or objects presently retained by the court clerk. All exhibits

1 received in evidence or marked for identification, unless
2 specifically ordered sealed¹, are matters of public record and
3 shall be available for public inspection or use to the same
4 extent that any such exhibit would be available in any other
5 lawsuit. In other words they are to be treated henceforth no
6 differently than similar exhibits in other cases in Superior
7 Court. Furthermore, the "inventory list and description," of
8 materials turned over by Armstrong's attorneys to the court,
9 shall not be considered or deemed to be confidential, private,
10 or under seal.

11 All other documents or objects presently in the possession
12 of the clerk (not marked herein as court exhibits) shall be
13 retained by the clerk, subject to the same orders as are
14 presently in effect as to sealing and inspection, until such
15 time as trial court proceedings are concluded as to the severed
16 cross complaint. For the purposes of this Judgment, conclusion
17 will occur when any motion for a new trial has been denied, or
18 the time within such a motion must be brought has expired
19 without such a motion being made. At that time, all documents
20 neither received in evidence, nor marked for identification
21 only, shall be released by the clerk to plaintiff's
22 representatives. Notwithstanding this order, the parties may
23
24

25 1. Exhibits in evidence No. 500-40; JJJ; KKK; LLL: MMM;
26 NNN; OOO; PPP; QQQ; RRR; and 500-QQQQ.

27 Exhibits for identification only No. JJJJ; Series
28 500-DDDD, EEEE, FFFF, GGGG, HHHH, IIII, NNNN-1, OOOO, ZZZZ,
CCCCC, GGGGG, IIIII, KKKKK, LLLLL, OOOOO, PPPPP, QQQQQ, BBBBBB,
OOOOOO, BBBBBBB.

1 at any time by written stipulation filed with the clerk obtain
2 release of any or all such unused materials.

3 Defendant and his counsel are free to speak or communicate
4 upon any of Defendant Armstrong's recollections of his life as
5 a Scientologist or the contents of any exhibit received in
6 evidence or marked for identification and not specifically
7 ordered sealed. As to all documents, and other materials held
8 under seal by the clerk, counsel and the defendant shall remain
9 subject to the same injunctions as presently exist, at least
10 until the conclusion of the proceedings on the cross complaint.
11 However, in any other legal proceedings in which defense
12 counsel, or any of them, is of record, such counsel shall have
13 the right to discuss exhibits under seal, or their contents, if
14 such is reasonably necessary and incidental to the proper
15 representation of his or her client.

16 Further, if any court of competent jurisdiction orders
17 defendant or his attorney to testify concerning the fact of any
18 such exhibit, document, object, or its contents, such testimony
19 shall be given, and no violation of this order will occur.
20 Likewise, defendant and his counsel may discuss the contents of
21 any documents under seal or of any matters as to which this
22 court has found to be privileged as between the parties hereto,
23 with any duly constituted Governmental Law Enforcement Agency
24 or submit any exhibits or declarations thereto concerning such
25 document or materials, without violating any order of this
26 court.

27 ///

28 ///

This court will retain jurisdiction to enforce, modify, alter, or terminate any injunction included within the Judgment.

Counsel for defendant is ordered to prepare, serve, and file a Judgment on the Complaint and Complaint in Intervention, and Statement of Decision if timely and properly requested, consistent with the court's intended decision.

Discussion

The court has found the facts essentially as set forth in defendant's trial brief, which as modified, is attached as an appendix to this memorandum. In addition the court finds that while working for L.R. Hubbard (hereinafter referred to as LRH), the defendant also had an informal employer-employee relationship with plaintiff Church, but had permission and authority from plaintiffs and LRH to provide Omar Garrison with every document or object that was made available to Mr. Garrison, and further, had permission from Omar Garrison to take and deliver to his attorneys the documents and materials which were subsequently delivered to them and thenceforth into the custody of the County Clerk.

Plaintiff Church has made out a prima facie case of conversion (as bailee of the materials), breach of fiduciary duty, and breach of confidence (as the former employer who provided confidential materials to its then employee for certain specific purposes, which the employee later used for other purposes to plaintiff's detriment). Plaintiff Mary Jane Hubbard has likewise made out a prima facie case of conversion

1 and invasion of privacy (misuse by a person of private matters
2 entrusted to him for certain specific purposes only).

3 While defendant has asserted various theories of defense,
4 the basic thrust of his testimony is that he did what he did,
5 because he believed that his life, physical and mental well
6 being, as well as that of his wife were threatened because the
7 organization was aware of what he knew about the life of LRH,
8 the secret machinations and financial activities of the Church,
9 and his dedication to the truth. He believed that the only way
10 he could defend himself, physically as well as from harassing
11 lawsuits, was to take from Omar Garrison those materials which
12 would support and corroborate everything that he had been
13 saying within the Church about LRH and the Church, or refute
14 the allegations made against him in the April 22 Suppressive
15 Person Declare. He believed that the only way he could be sure
16 that the documents would remain secure for his future use was
17 to send them to his attorneys, and that to protect himself, he
18 had to go public so as to minimize the risk that LRH, the
19 Church, or any of their agents would do him physical harm.

20 This conduct if reasonably believed in by defendant and
21 engaged in by him in good faith, finds support as a defense to
22 the plaintiff's charges in the Restatements of Agency, Torts,
23 and case law.

24 Restatement of Agency, Second, provides:

25 "Section 395f: An agent is privileged to reveal
26 information confidentially acquired by him in the course
27 of his agency in the protection of a superior interest of
28 himself or a third person.

1 "Section 418: An agent is privileged to protect
2 interests of his own which are superior to those of the
3 principal, even though he does so at the expense of the
4 principal's interest or in disobedience to his orders."

5 Restatement of torts, Second, section 271:

6 "One is privileged to commit an act which would
7 otherwise be a trespass to or a conversion of a chattel in
8 the possession of another, for the purpose of defending
9 himself or a third person against the other, under the
10 same conditions which would afford a privilege to inflict
11 harmful or offensive contact upon the other for the same
12 purpose."

13 The Restatement of Torts, Second, section 652a, as well as
14 case law, make it clear that not all invasions of privacy are
15 unlawful or tortious. It is only when the invasion is
16 unreasonable that it becomes actionable. Hence, the trier of
17 fact must engage in a balancing test, weighing the nature and
18 extent of the invasion, as against the purported justification
19 therefore to determine whether in a given case, the particular
20 invasion or intrusion was unreasonable.

21 In addition the defendant has asserted as a defense the
22 principal involved in the case of Willig v. Gold, 75
23 Cal.App.2d, 809, 814, which holds that an agent has a right or
24 privilege to disclose his principal's dishonest acts to the
25 party prejudicially affected by them.

26 Plaintiff Church has asserted and obviously has certain
27 rights arising out of the First Amendment. Thus, the court
28 cannot, and has not, inquired into or attempted to evaluate the

1 merits, accuracy, or truthfulness of Scientology or any of its
2 precepts as a religion. First Amendment rights, however,
3 cannot be utilized by the Church or its members, as a sword to
4 preclude the defendant, whom the Church is suing, from
5 defending himself. Therefore, the actual practices of the
6 Church or its members, as it relates to the reasonableness of
7 the defendant's conduct and his state of mind are relevant,
8 admissible, and have been considered by the court.

9 As indicated by its factual findings, the court finds the
10 testimony of Gerald and Jocelyn Armstrong, Laurel Sullivan,
11 Nancy Dincalcis, Edward Walters, Omar Garrison, Kima Douglas,
12 and Howard Schomer to be credible, extremely persuasive, and
13 the defense of privilege or justification established and
14 corroborated by this evidence. Obviously, there are some
15 discrepancies or variations in recollections, but these are the
16 normal problems which arise from lapse of time, or from
17 different people viewing matters or events from different
18 perspectives. In all critical and important matters, their
19 testimony was precise, accurate, and rang true. The picture
20 painted by these former dedicated Scientologists, all of whom
21 were intimately involved with LRH, or Mary Jane Hubbard, or of
22 the Scientology Organization, is on the one hand pathetic, and
23 on the other, outrageous. Each of these persons literally gave
24 years of his or her respective life in support of a man, LRH,
25 and his ideas. Each has manifested a waste and loss or
26 frustration which is incapable of description. Each has broken
27 with the movement for a variety of reasons, but at the same
28 time, each is, still bound by the knowledge that the Church has

1 in its possession his or her most inner thoughts and
2 confessions, all recorded in "pre-clear (P.C.) folders" or
3 other security files of the organization, and that the Church
4 or its minions is fully capable of intimidation or other
5 physical or psychological abuse if it suits their ends. The
6 record is replete with evidence of such abuse.

7 In 1970 a police agency of the French Government conducted
8 an investigation into Scientology and concluded, "this sect,
9 under the pretext of 'freeing humans' is nothing in reality but
10 a vast enterprise to extract the maximum amount of money from
11 its adepts by (use of) pseudo-scientific theories, by (use of)
12 'auditions' and 'stage settings' (lit. to create a theatrical
13 scene') pushed to extremes (a machine to detect lies, its own
14 particular phraseology . . .), to estrange adepts from their
15 families and to exercise a kind of blackmail against persons
16 who do not wish to continue with this sect."² From the
17 evidence presented to this court in 1984, at the very least,
18 similar conclusions can be drawn. In addition to violating and
19 abusing its own members civil rights, the organization over the
20 years with its "Fair Game" doctrine has harassed and abused
21 those persons not in the Church whom it perceives as enemies.
22 The organization clearly is schizophrenic and paranoid, and
23 this bizarre combination seems to be a reflection of its
24 founder LRH. The evidence portrays a man who has been
25 virtually a pathological liar when it comes to his history,
26
27

28 2. Exhibit 500-HHHHH.

1 background, and achievements. The writings and documents in
2 evidence additionally reflect his egoism, greed, avarice, lust
3 for power, and vindictiveness and aggressiveness against
4 persons perceived by him to be disloyal or hostile. At the
5 same time it appears that he is charismatic and highly capable
6 of motivating, organizing, controlling, manipulating, and
7 inspiring his adherents. He has been referred to during the
8 trial as a "genius," a "revered person," a man who was "viewed
9 by his followers in awe." Obviously, he is and has been a very
10 complex person, and that complexity is further reflected in his
11 alter ego, the Church of Scientology. Notwithstanding
12 protestations to the contrary, this court is satisfied that LRH
13 runs the Church in all ways through the Sea Organization, his
14 role of Commodore, and the Commodore's Messengers.³ He has, of
15 course, chosen to go into "seclusion," but he maintains contact
16 and control through the top messengers. Seclusion has its
17 light and dark side too. It adds to his mystique, and yet
18 shields him from accountability and subpoena or service of
19 summons.

20 LRH's wife, Mary Sue Hubbard is also a plaintiff herein.
21 On the one hand she certainly appeared to be a pathetic
22 individual. She was forced from her post as Controller,
23 convicted and imprisoned as a felon, and deserted by her
24 husband. On the other hand her credibility leaves much to be
25 desired. She struck the familiar pose of not seeing, hearing,
26

27 3. See Exhibit K: Flag Order 3729 - 15 September 1978
28 "Commodore's Messengers."

1 or knowing any evil. Yet she was the head of the Guardian
2 Office for years and among other things, authored the infamous
3 order "GO 121669"⁴ which directed culling of supposedly
4 confidential P.C. files/folders for purposes of internal
5 security. In her testimony she expressed the feeling that
6 defendant by delivering the documents, writings, letters to his
7 attorneys, subjected her to mental rape. The evidence is clear
8 and the court finds that defendant and Omar Garrison had
9 permission to utilize these documents for the purpose of
10 Garrison's proposed biography. The only other persons who were
11 shown any of the documents were defendant's attorneys, the
12 Douglasses, the Dincalcis, and apparently some documents
13 specifically affecting LRH's son "Nibs," were shown to "Nibs."
14 The Douglasses and Dincalcises were disaffected Scientologists
15 who had a concern for their own safety and mental security, and
16 were much in the same situation as defendant. They had not
17 been declared as suppressive, but Scientology had their P.C.
18 folders, as well as other confessions, and they were extremely
19 apprehensive. They did not see very many of the documents, and
20 it is not entirely clear which they saw. At any rate Mary Sue
21 Hubbard did not appear to be so much distressed by this fact,
22 as by the fact that Armstrong had given the documents to
23 Michael Flynn, whom the Church considered its foremost
24
25
26
27
28

4. Exhibit AAA.

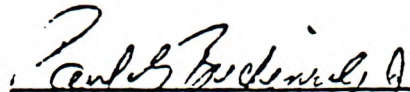
1 lawyer-enemy.⁵ However, just as the plaintiffs have First
2 Amendment rights, the defendant has a Constitutional right to
3 an attorney of his own choosing. In legal contemplation the
4 fact that defendant selected Mr. Flynn rather than some other
5 lawyer cannot by itself be tortious. In determining whether
6 the defendant unreasonably invaded Mrs. Hubbard's privacy, the
7 court is satisfied the invasion was slight, and the reasons and
8 justification for defendant's conduct manifest. Defendant was
9 told by Scientology to get an attorney. He was declared an
10 enemy by the Church. He believed, reasonably, that he was
11 subject to "fair game." The only way he could defend himself,
12 his integrity, and his wife was to take that which was
13 available to him and place it in a safe harbor, to wit, his
14 lawyer's custody. He may have engaged in overkill, in the
15 sense that he took voluminous materials, some of which appear
16 only marginally relevant to his defense. But he was not a
17 lawyer and cannot be held to that precise standard of judgment.
18 Further, at the time that he was accumulating the material, he
19 was terrified and undergoing severe emotional turmoil. The
20 court is satisfied that he did not unreasonably intrude upon
21 Mrs. Hubbard's privacy under the circumstances by in effect
22 simply making his knowledge that of his attorneys. It is, of
23 course, rather ironic that the person who authorized G.O. order
24 121669 should complain about an invasion of privacy. The

25
26 5. "No, I think my emotional distress and upset is the
27 fact that someone took papers and materials without my
28 authorization and then gave them to your Mr. Flynn."
Reporter's Transcript, p. 1006.

1 practice of culling supposedly confidential "P.C. folders or
2 files" to obtain information for purposes of intimidation
3 and/or harassment is repugnant and outrageous. The Guardian's
4 Office, which plaintiff headed, was no respecter of anyone's
5 civil rights, particularly that of privacy. Plaintiff Mary Sue
6 Hubbard's cause of action for conversion must fail for the same
7 reason as plaintiff Church. The documents were all together in
8 Omar Garrison's possession. There was no rational way the
9 defendant could make any distinction.


10 Insofar as the return of documents is concerned, matters
11 which are still under seal may have evidentiary value in the
12 trial of the cross complaint or in other third party
13 litigation. By the time that proceedings on the cross
14 complaint are concluded, the court's present feeling is that
15 those documents or objects not used by that time should be
16 returned to plaintiff. However, the court will reserve
17 jurisdiction to reconsider that should circumstances warrant.

18 Dated: June 10, 1984

19
20 
21 PAUL G. BRECKENRIDGE, JR.
22 Judge of the Superior Court
23

24 THE DOCUMENT TO WHICH THIS CERTIFICATE IS AT-
25 TACHED IS A FULL, TRUE AND CORRECT COPY OF THE
26 ORIGINAL ON FILE AND OF RECORD IN MY OFFICE.

27 ATTEST AUG 8 1984 19

28 JOHN J. CORCORAN County Clerk and Clerk of the
Superior Court of California
County of Los Angeles
BY  DEPUTY

S. HURST

Appendix

Defendant Armstrong was involved with Scientology from 1969 through 1981, a period spanning 12 years. During that time he was a dedicated and devoted member who revered the founder, L. Ron Hubbard. There was little that Defendant Armstrong would not do for Hubbard or the Organization. He gave up formal education, one-third of his life, money and anything he could give in order to further the goals of Scientology, goals he believed were based upon the truth, honesty, integrity of Hubbard and the Organization.

From 1971 through 1981, Defendant Armstrong was a member of the Sea Organization, a group of highly trained scientologists who were considered the upper echelon of the Scientology organization.⁶ During those years he was placed in various locations, but it was never made clear to him exactly which Scientology corporation he was working for. Defendant Armstrong understood that, ultimately, he was working for L. Ron Hubbard, who controlled all Scientology finances, personnel, and operations while Defendant was in the Sea Organization.

Beginning in 1979 Defendant Armstrong resided at Gilman Hot Springs, California, in Hubbard's "Household Unit." The Household Unit took care of the personal wishes and needs of Hubbard at many levels. Defendant Armstrong acted as the L. Ron Hubbard Renovations In-Charge and was responsible for renovations, decoration, and maintenance of Hubbard's home and office at Gilman Hot Springs.

///

1 In January of 1980 there was an announcement of a possible
2 raid to be made by the FBI or other law enforcement agencies of
3 the property. Everyone on the property was required by
4 Hubbard's representatives, the Commodore's Messengers, to go
5 through all documents located on the property and "vet" or
6 destroy anything which showed that Hubbard controlled
7 Scientology organizations, retained financial control, or was
8 issuing orders to people at Gilman Hot Springs.

9 A commercial paper shredder was rented and operated day
10 and night for two weeks to destroy hundreds of thousands of
11 pages of documents.

12 During the period of shredding, Brenda Black, the
13 individual responsible for storage of Hubbard's personal
14 belongings at Gilman Hot Springs, came to Defendant Armstrong
15 with a box of documents and asked whether they were to be
16 shredded. Defendant Armstrong reviewed the documents and found
17 that they consisted of a wide variety of documents including
18 Hubbard's personal papers, diaries, and other writings from a
19 time before he started Dianetics in 1950, together with
20 documents belonging to third persons which had apparently been
21 stolen by Hubbard or his agents. Defendant Armstrong took the
22 documents from Ms. Black and placed them in a safe location on
23 the property. He then searched for and located another twenty
24 or more boxes containing similar materials, which were poorly
25 maintained.

26 On January 8, 1980, Defendant Armstrong wrote a petition
27 to Hubbard requesting his permission to perform the research
28 for a biography to be done about his life. The petition states

1 that Defendant Armstrong had located the subject materials and
2 lists of a number of activities he wished to perform in
3 connection with the biography research.

4 Hubbard approved the petition, and Defendant Armstrong
5 became the L. Ron Hubbard Personal Relations Officer Researcher
6 (PPRO Res). Defendant claims that this petition and its
7 approval forms the basis for a contract between Defendant and
8 Hubbard. Defendant Armstrong's supervisor was then Laurel
9 Sullivan, L. Ron Hubbard's Personal Public Relations Officer.

10 During the first part of 1980, Defendant Armstrong moved
11 all of the L. Ron Hubbard Archives materials he had located at
12 Gilman Hot Springs to an office in the Church of Scientology
13 Cedars Complex in Los Angeles. These materials comprised
14 approximately six file cabinets. Defendant Armstrong had
15 located himself in the Cedars Complex, because he was also
16 involved in "Mission Corporate Category Sort-Out," a mission to
17 work out legal strategy. Defendant Armstrong was involved with
18 this mission until June of 1980.

19 It was also during this early part of 1980 that Hubbard
20 left the location in Gilman Hot Springs, California, and went
21 into hiding. Although Defendant Armstrong was advised by
22 Laurel Sullivan that no one could communicate with Hubbard,
23 Defendant Armstrong knew that the ability for communication
24 existed, because he had forwarded materials to Hubbard at his
25 request in mid-1980.

26 Because of this purported inability to communicate with
27 Hubbard, Defendant Armstrong's request to purchase biographical
28 materials of Hubbard from people who offered them for sale went

1 to the Commodore's Messenger Organization, the personal
2 representatives of Hubbard.

3 In June of 1980 Defendant Armstrong became involved in the
4 selection of a writer for the Hubbard biography. Defendant
5 Armstrong learned that Hubbard had approved of a biography
6 proposal prepared by Omar Garrison, a writer who was not a
7 member of Scientology. Defendant Armstrong had meetings with
8 Mr. Garrison regarding the writing of the biography and what
9 documentation and assistance would be made available to him.
10 As understood by Mr. Garrison, Defendant Armstrong represented
11 Hubbard in these discussions.

12 Mr. Garrison was advised that the research material he
13 would have at his disposal were Hubbard's personal archives.
14 Mr. Garrison would only undertake a writing of the biography if
15 the materials provided to him were from Hubbard's personal
16 archives, and only if his manuscript was subject to the
17 approval of Hubbard himself.

18 In October of 1980 Mr. Garrison came to Los Angeles and
19 was toured through the Hubbard archives materials that
20 Defendant Armstrong had assembled up to that time. This was an
21 important "selling point" in obtaining Mr. Garrison's agreement
22 to write the biography. On October 30, 1980, an agreement was
23 entered into between Ralston-Pilot, ncv. F/S/O Omar V.
24 Garrison, and AOSH DK Publications of Copenhagen, Denmark, for
25 the writing of a biography of Hubbard.

26 Paragraph 10B of the agreement states that:

27 "Publisher shall use its best efforts to provide
28 Author with an office, an officer assistant and/or

1 research assistant, office supplies and any needed
2 archival and interview materials in connection with
3 the writing of the Work."

4 The "research assistant" provided to Mr. Garrison was
5 Defendant Armstrong.

6 During 1980 Defendant Armstrong exchanged correspondence
7 with Intervenor regarding the biography project. Following his
8 approval by Hubbard as biography researcher, Defendant
9 Armstrong wrote to Intervenor on February 5, 1980, advising her
10 of the scope of the project. In the letter Defendant stated
11 that he had found documents which included Hubbard's diary from
12 his Orient trip, poems, essays from his youth, and several
13 personal letters, as well as other things.

14 By letter of February 11, 1980, Intervenor responded to
15 Defendant, acknowledging that he would be carrying out the
16 duties of Biography Researcher.

17 On October 14, 1980, Defendant Armstrong again wrote to
18 Intervenor, updating her on "Archives materials" and proposing
19 certain guidelines for the handling of those materials.

20 It was Intervenor who, in early 1981, ordered certain
21 biographical materials from "Controller Archives" to be
22 delivered to Defendant Armstrong. These materials consisted of
23 several letters written by Hubbard in the 1920's and 1930's,
24 Hubbard's Boy Scout books and materials, several old Hubbard
25 family photographs, a diary kept by Hubbard in his youth, and
26 several other items.

27 Defendant Armstrong received these materials upon the
28 order of Intervenor, following his letter of October 15, 1980,

1 to her in which Defendant stated, at page 7, that there were
2 materials in the "Controller Archives" that would be helpful to
3 him in the biography research.

4 After these materials were delivered to Defendant
5 Armstrong, Intervenor was removed from her Scientology position
6 of Controller in 1981, presumably because of her conviction for
7 the felony of obstruction of justice in connection with the
8 theft of Scientology documents from various government offices
9 and agencies in Washington, D.C.

10 During the time Defendant Armstrong worked on the
11 biography project and acted as Hubbard Archivist, there was
12 never any mention that he was not to be dealing with Hubbard's
13 personal documents or that the delivery of those documents to
14 Mr. Garrison was not authorized.

15 For the first year or more of the Hubbard biography and
16 archive project, funding came from Hubbard's personal staff
17 unit at Gilman Hot Springs, California. In early 1981,
18 however, Defendant Armstrong's supervisor, Laurel Sullivan,
19 ordered him to request that funding come from what was known as
20 SEA Org Reserves. Approval for this change in funding came
21 from the SEA Org Reserves Chief and Watch Dog Committee, the
22 top Commodores Messenger Organization unit, who were Hubbard's
23 personal representatives.

24 From November of 1980 through 1981, Defendant Armstrong
25 worked closely with Mr. Garrison, assembling Hubbard's archives
26 into logical categories, copying them and arranging the copies
27 of the Archives materials into bound volumes. Defendant
28 Armstrong made two copies of almost all documents copied for

1 Mr. Garrison - one for Mr. Garrison and the other to remain in
2 Hubbard Archives for reference or recopying. Defendant
3 Armstrong created approximately 400 binders of documents. The
4 vast majority of the documents for Mr. Garrison came from
5 Hubbard's personal Archives, of which Defendant Armstrong was
6 in charge. Materials which came from other Archives, such as
7 the Controller Archives, were provided to Defendant Armstrong
8 by Scientology staff members who had these documents in their
9 care.

10 It was not until late 1981 that Plaintiff was to provide a
11 person to assist on the biography project by providing Mr.
12 Garrison with "Guardian Office" materials, otherwise described
13 as technical materials relating to the operation of
14 Scientology. The individual appointed for this task was Vaughn
15 Young. Controller Archives and Guardian Office Archives had no
16 connection to the Hubbard Archives, which Defendant Armstrong
17 created and maintained as Hubbard's personal materials.

18 In addition to the assemblage of Hubbard's Archives,
19 Defendant Armstrong worked continually on researching and
20 assembling materials concerning Hubbard by interviewing dozens
21 of individuals, including Hubbard's living aunt, uncle, and
22 four cousins. Defendant Armstrong did a geneology study of
23 Hubbard's family and collected, assembled, and read hundreds of
24 thousands of pages of documentation in Hubbard's Archives.

25 During 1980 Defendant Armstrong remained convinced of
26 Hubbard's honesty and integrity and believed that the
27 representations he had made about himself in various
28 publications were truthful. Defendant Armstrong was devoted to

1 Hubbard and was convinced that any information which he
2 discovered to be unflattering of Hubbard or contradictory to
3 what Hubbard has said about himself, was a lie being spread by
4 Hubbard's enemies. Even when Defendant Armstrong located
5 documents in Hubbard's Archives which indicated that
6 representations made by Hubbard and the Organization were
7 untrue, Defendant Armstrong would find some means to "explain
8 away" the contradictory information.

9 Slowly, however, throughout 1981, Defendant Armstrong
10 began to see that Hubbard and the Organization had continuously
11 lied about Hubbard's past, his credentials, and his
12 accomplishments. Defendant Armstrong believed, in good faith,
13 that the only means by which Scientology could succeed in what
14 Defendant Armstrong believed was its goal of creating an
15 ethical environment on earth, and the only way Hubbard could be
16 free of his critics, would be for Hubbard and the Organization
17 to discontinue the lies about Hubbard's past, his credentials,
18 and accomplishments. Defendant Armstrong resisted any public
19 relations piece or announcement about Hubbard which the L. Ron
20 Hubbard Public Relations Bureau proposed for publication which
21 was not factual. Defendant Armstrong attempted to change and
22 make accurate the various "about the author" sections in
23 Scientology books, and further, Defendant rewrote or critiqued
24 several of these and other publications for the L. Ron Hubbard
25 Public Relations Bureau and various Scientology Organizations.
26 Defendant Armstrong believed and desired that the Scientology
27 Organization and its leader discontinue the perpetration of the
28 ///

1 massive fraud upon the innocent followers of Scientology, and
2 the public at large.

3 Because of Defendant Armstrong's actions, in late November
4 of 1981, Defendant was requested to come to Gilman Hot Springs
5 by Commodore Messenger Organization Executive, Cirrus Slevin.
6 Defendant Armstrong was ordered to undergo a "security check,"
7 which involved Defendant Armstrong's interrogation while
8 connected to a crude Scientology lie detector machine called an
9 E-meter.

10 The Organization wished to determine what materials
11 Defendant Armstrong had provided to Omar Garrison. Defendant
12 Armstrong was struck by the realization that the Organization
13 would not work with him to correct the numerous fraudulent
14 representations made to followers of Scientology and the public
15 about L. Ron Hubbard and the Organization itself. Defendant
16 Armstrong, who, for twelve years of his life, had placed his
17 complete and full trust in Mr. and Mrs. Hubbard and the
18 Scientology Organization, saw that his trust had no meaning and
19 that the massive frauds perpetrated about Hubbard's past,
20 credentials, and accomplishments would continue to be spread.

21 Less than three weeks before Defendant Armstrong left
22 Scientology, he wrote a letter to Cirrus Slevin on November 25,
23 1981, in which it is clear that his intentions in airing the
24 inaccuracies, falsehoods, and frauds regarding Hubbard were
25 done in good faith. In his letter he stated as follows:

26 "If we present inaccuracies, hyperbole
27 or downright lies as fact or truth, it
28 doesn't matter what slant we give them, if

1 disproved the man will look, to outsiders
2 at least, like a charlatan. This is what
3 I'm trying to prevent and what I've been
4 working on the past year and a half.

5 . . .

6 "and that is why I said to Norman that
7 it is up to us to insure that everything
8 which goes out about LRH is one hundred
9 percent accurate. That is not to say that
10 opinions can't be voiced, they can. And
11 they can contain all the hype you want.
12 But they should not be construed as facts.
13 And anything stated as a fact should be
14 documentable.

15 "we are in a period when
16 'investigative reporting' is popular, and
17 when there is relatively easy access to
18 documentation on a person. We can't delude
19 ourselves I believe, if we want to gain
20 public acceptance and cause some betterment
21 in society, that we can get away with
22 statements, the validity of which we don't
23 know.

24 "The real disservice to LRH, and the
25 ultimate make-wrong is to go on assuming
26 that everything he's ever written or said
27 is one hundred percent accurate and publish
28 it as such without verifying it. I'm

1 talking here about biographical or
2 non-technical writings. This only leads,
3 should any of his statements turn out to be
4 inaccurate, to a make-wrong of him, and
5 consequently his technology.

6 "That's what I'm trying to remedy and
7 prevent.

8 . . .

9 "To say that LRH is not capable of
10 hype, errors or lies is certainly [^]sic; not
11 granting him much of a beingness. To
12 continue on with the line that he has never
13 erred nor lied is counterproductive. It is
14 an unreal attitude and too far removed from
15 both the reality and people in general that
16 it would widen public unacceptance.

17 . . .

18 ". . . That is why I feel the
19 falsities must be corrected, and why we
20 must verify our facts and present them in a
21 favorable light."

22
23 The remainder of the letter contains examples of facts
24 about Hubbard which Defendant Armstrong found to be wholly
25 untrue or inaccurate and which were represented as true by the
26 Hubbards and the Scientology Organization.

27 In December of 1981 Defendant Armstrong made the decision
28 to leave the Church of Scientology. In order to continue in

1 his commitment to Hubbard and Mr. Garrison in the biography
2 project, he copied a large quantity of documents, which Mr.
3 Garrison had requested or which would be useful to him for the
4 biography. Defendant Armstrong delivered all of this material
5 to Mr. Garrison the date he left the SEA Organization and kept
6 nothing in his possession.

7 Thereafter, Defendant Armstrong maintained friendly
8 relations with Hubbard's representatives by returning to the
9 Archives office and discussing the various categories of
10 materials. In fact on February 24, 1982, Defendant Armstrong
11 wrote to Vaughn Young, regarding certain materials Mr. Young
12 was unable to locate for Omar Garrison.

13 After this letter was written, Defendant Armstrong went to
14 the Archives office and located certain materials Mr. Garrison
15 had wanted which Hubbard representatives claimed they could not
16 locate.

17 At the time Defendant Armstrong left the SEA Organization,
18 he was disappointed with Scientology and Hubbard, and also felt
19 deceived by them. However, Defendant Armstrong felt he had no
20 enemies and felt no ill will toward anyone in the Organization
21 or Hubbard, but still believed that a truthful biography should
22 be written.

23 After leaving the SEA Organization, Defendant Armstrong
24 continued to assist Mr. Garrison with the Hubbard biography
25 project. In the spring of 1982, Defendant Armstrong at Mr.
26 Garrison's request, transcribed some of his interview tapes,
27 copied some of the documentation he had, and assembled several
28 more binders of copied materials. Defendant Armstrong also set

1 up shelves for Mr. Garrison for all the biography research
2 materials, worked on a cross-reference systems, and continued
3 to do library research for the biography.

4 On February 18, 1982, the Church of Scientology
5 International issued a "Suppressive Person Declare Gerry
6 Armstrong," which is an official Scientology document issued
7 against individuals who are considered as enemies of the
8 Organization. Said Suppressive Person Declare charged that
9 Defendant Armstrong had taken an unauthorized leave and that he
10 was spreading destructive rumors about Senior Scientologists.

11 Defendant Armstrong was unaware of said Suppressive Person
12 Declare until April of 1982. At that time a revised Declare
13 was issued on April 22, 1982. Said Declare charged Defendant
14 Armstrong with 18 different "Crimes and High Crimes and
15 Suppressive Acts Against the Church." The charges included
16 theft, juggling accounts, obtaining loans on money under false
17 pretenses, promulgating false information about the Church ,
18 its founder, and members, and other untruthful allegations
19 designed to make Defendant Armstrong an appropriate subject of
20 the Scientology "Fair Game Doctrine." Said Doctrine allows any
21 suppressive person to be "tricked, cheated, lied to, sued, or
22 destroyed."

23 The second declare was issued shortly after Defendant
24 Armstrong attempted to sell photographs of his wedding on board
25 Hubbard's ship (in which Hubbard appears), and photographs
26 belonging to some of his friends, which also included photos of
27 L.R. Hubbard while in seclusion. Although Defendant Armstrong
28 delivered the photographs to a Virgil Wilhite for sale, he

1 never received payment or return of his friend's photographs.
2 When he became aware that the Church had these photographs, he
3 went to the Organization to request their return. A loud and
4 boisterous argument ensued, and he eventually was told to leave
5 the premises and get an attorney.

6 From his extensive knowledge of the covert and
7 intelligence operations carried out by the Church of
8 Scientology of California against its enemies (suppressive
9 persons), Defendant Armstrong became terrified and feared that
10 his life and the life of his wife were in danger, and he also
11 feared he would be the target of costly and harassing lawsuits.
12 In addition, Mr. Garrison became afraid for the security of the
13 documents and believed that the intelligence network of the
14 Church of Scientology would break and enter his home to
15 retrieve them. Thus, Defendant Armstrong made copies of
16 certain documents for Mr. Garrison and maintained them in a
17 separate location.

18 It was thereafter, in the summer of 1982, that Defendant
19 Armstrong asked Mr. Garrison for copies of documents to use in
20 his defense and sent the documents to his attorneys, Michael
21 Flynn and Contos & Bunch.

22 After the within suit was filed on August 2, 1982,
23 Defendant Armstrong was the subject of harassment, including
24 being followed and surveilled by individuals who admitted
25 employment by Plaintiff; being assaulted by one of these
26 individuals; being struck bodily by a car driven by one of
27 these individuals; having two attempts made by said individuals
28 apparently to involve Defendant Armstrong in a freeway

1 automobile accident; having said individuals come onto
2 Defendant Armstrong's property, spy in his windows, create
3 disturbances, and upset his neighbors. During trial when it
4 appeared that Howard Schomer (a former Scientologist) might be
5 called as a defense witness, the Church engaged in a somewhat
6 sophisticated effort to suppress his testimony. It is not
7 clear how the Church became aware of defense intentions to call
8 Mr. Schomer as a witness, but it is abundantly clear they
9 sought to entice him back into the fold and prevent his
10 testimony.
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On Tue, 24 Jun 1997 17:08:42 GMT, byrd.NOSPAM@acm.org (Jim Byrd) wrote:

>On 24 Jun 1997 02:41:10 GMT, "Ford Greene" <fgreene@well.com> wrote:

>

>>6. Subsequently in late 1996 or 1997 Gerry sent a declaration on Grady

>>Ward's behalf directly to the judge in Ward's case. Gerry was not

>>subpoened (the injunction does not prohibit him from responding to a

>>subpena, or voluntarily talking to government official investigating

>>criminal activity)

>

>I thought Grady had posted a gif of a subpoena to Gerry Armstrong. Do

>I remember incorrectly?

>-----

Grady *did* subpoena me, and it was completely legal for me to produce to him (and the other parties) the documents I did produce. Within a day or so of my receipt of Grady's subpoena, I received a letter from Scientology attorney Andrew Wilson threatening me if I produced any documents pursuant to Grady's subpoena.

Wilson stated: "These [alleged] defects [in Grady's subpoena] , and other substantive {unspecified} reasons are the basis for a motion for protective order in *RTC v. Ward*. I insist that you refrain from premature disclosure of documents before this motion can be heard. I believe that the [subject December 1986] Agreement requires no less..."

The injunction issued by Judge Gary W. Thomas in my case (Marin Superior Court No. 157680) permits me to voluntarily assist governmental organs or entities regarding Scientology. Therefore it was completely legal for me to advise Judge Whyte, who is a governmental organ, of the threat by Scientology, which is unequivocal obstruction of justice.

The "settlement agreement" did not allow me to communicate to governmental agencies, but the injunction does. I was at least successful in achieving that permission in the litigation.

Scientology (er, RTC) never did bring its motion for protective order in the *Ward* case, and by not bringing it could have delayed Grady's ever receiving from the documents he had subpoenaed.

Scientology lawyer Lawrence Heller threatened me a number of times in 1989 when I was subpoenaed for a deposition in the Bent Corydon v. Scientology litigation that if I testified about

Hubbard's lies and so forth, even though subpoenaed, the organization would sue me. Those threats were what finally brought me back into the thereafter day to day conflict with the cult.

Judge Thomas was wrong in signing Scientology's order of contempt of court, but he has signed just about anything the cult asks him to, so I did not expect different treatment. There will come a time not far from now when the organization will acknowledge all the injustices it has perpetrated and Scientologists will ask to be allowed to correct the wrongs their group has done.

I did not really leave the US because of fear of being jailed at Judge Thomas's hands. During the brief time I had an internet account in the US I stumbled (thank God for the net) onto the reason I am at great risk; or rather why David Miscavige and his co-conspirators think they are at such great risk they must silence me at any cost. I will detail this in a subsequent post.

I have just received Judge Thomas's contempt order, and will attempt to resolve it from here in Canada. If I can't then there will come a time when I will return and resolve it in the US. I will let everyone know so an exciting event can be had by all. Perhaps Xenu will show in his Floofmobile.

I was happy to see Ford Greene's post about the sentencing and the Armstrong litigation, because by speaking up, and discussing, as my attorney, the undiscussable, he is telling the cult to take a hike; as everyone should. I was happy to see some kind words from him too, as we share a great and honorable battle for over four years together. The Thomas injunction caused so much strain between us that my departure from his office was not a happy time, but those things happen. And Ford remains one of the very very few attorneys willing to fight that battle against that most dishonorable and dangerous fair game machine.

Now let's click on send and see if this thing works.

Gerry Armstrong

On 13 Jul 1997 09:33:22 +0200, nobody@REPLAY.COM (Anonymous) wrote:

>I drove past a billboard in Hollywood advertising "Scientology:
A New Slant
>on Life."
>
>The ad stated baldly that Scientology routinely altered IQ. The
clear
>implication was that the changes are consistently in the plus
direction.
>
>This seems like a simple enough thing to demonstrate. Does
Scientology
>offer evidence for this claim?
>If so, where can I find it?

If the billboard actually stated that "Scientology routinely altered IQ," then it is quite accurate. Scientology alters IQ by making people more stupid.

It does not, however, *raise* IQ. Hubbard asserted that auditing, his brand of psychotherapy, raised IQ a point per hour. He claimed this was demonstrably true scientific fact.

There are plenty of scientologists around who have had over a thousand hours of auditing. They are all in the normal IQ range, except a bit stupider than when they started in the cult.

In part this is due to the atrophying of the thinking processes, since real thinking is not allowed in the cult; in part because scientology implants all sorts of wrong answers to all sorts of questions; in part because of the psycho pressures associated with being in the cult and subject to its stupid orders and threats; and in part because so much of the normally available capacity for intelligent thought is consumed by devoting it to justifying the stupidity in being in the cult, and arguing that becoming stupider is really being smarter.

It should be noted that the raising of IQ is a secular representation, not a "religious" promise. It is part of the secular fraud of the cult, and should be actionable legally, although IANAL.

The fact that scientology makes people more stupid is in part why it should be opposed in every country and every context. In that the US has apparently embraced it as its state "religion," it is expected that the national intelligence will decline; which is really stupid. Allowing it to infiltrate the education system and make children stupid is also unwise.

Hubbard wrote, in the days when he was developing his psychotherapy, "All men are my slaves." He also stated that he had the right to "use men's minds" as he wished. He never

repudiated these assertions, his organization doesn't repudiate these assertions, and both he and his organization acted and act as if these assertions are true and their modus operandi. Isn't it stupid to believe and follow and give one's mind and soul to a cult leader and his cult who seek your enslavement?

Gerry

On Mon, 14 Jul 1997 20:40:18 -0600, scarff@iag.net wrote:

>Word has it that the motions are in place to ferret Mr.
Armstrong back to
>the United State, involuntarily if necessary, to answer to
federal
>charges of elluding U.S.laws.

>

>-----==== Posted via Deja News

=====

> <http://www.dejanews.com/> Search, Read, Post to Usenet

Garry:

Please state what word you heard, when, where and from whom.

I do not take the threat you have relayed lightly. The cult has kidnapped its own members (e.g., Roxanne Friend) and imprisoned others (e.g., Lisa McPherson). It isn't a big step to grabbing a real enemy. You have testified about your involvement in assassination plots. You admit you've recently been meeting with scientologists. Now state the facts on which your above threat is based.

Gerry Armstrong

On 22 Jul 1997 06:22:01 GMT, kewyatt@kelly.teleport.com (Keith Wyatt) wrote:

>Gerry, I have a question for you.

>

>I want to read your whole side of the story from start to finish.

>

>Why do you feel you have been unfairly and unjustly treated?

>

>Keith

>

My whole side of the story is now twenty-eight years long, thousands of pages of my writing, sixty some odd days of sworn oral testimony, and a paper mountain of related documents. It is too long to post here, and inappropriate in this context because it belongs between book covers.

Perhaps, however, this may answer your question concerning the unfairness and unjustness of Scientology's treatment of me. Understand that it is as much its treatment of others which has brought me to do the things I've done, say the things I've said and take the stand I've taken. If I were Scientology's sole target, and it treated the rest of the world fairly and justly, I wouldn't do or say many of the things I've done or said.

You have asked me publicly to answer a question you have, which presumably has some importance to you. Your question legitimately might have some importance to you because my conflict with Scientology is widely known; i.e., it is a public controversy. The organization has sued me five times and attempted to have me charged criminally, including by the FBI. These things are public records. My information and testimony has been used in major publications about Scientology and its founder Hubbard; e.g., A Piece of Blue Sky, Madman or Messiah, Bare-Faced Messiah. My first litigation with Scientology exists as a published opinion, and hence precedent, and my name and history have made it to the US Spureme Court; see, e.g., US v. Zolin. Scientology has itself published a small paper mountain of black PR about me, and continues to black PR me.

So there is a public controversy about my history, character and credibility, which you have joined. Indeed you have entered your own comments and opinions into that public controversy. Eg., from "Armstrong's Cult Bag is Empty:"

"Gerry, You getting to involved in this "evil cult" beliefsystem. I suggest you take up a new line of work, like ambulance chasing. You seem to have that great running ability!

By the way is this our dead agent attack against Scarrf? If so, I think you should go back to your CoS notebook and brush up on your skills."

As an aside, ambulance chasing is relegated to lawyers, and aismtbianal.

It is unfair and unjust that the person about whom there is a public controversy, concerning such personal things as his history, character and credibility, is barred by the entity manufacturing that controversy - the Scientology enterprise under David Miscavige - from entering that controversy, providing his side and his viewpoint, and possibly ending the controversy.

During my time inside Scientology I participated in, uncovered and documented a massive fraud. This includes, but is not limited to, fraud concerning Hubbard's past, credentials and promises, and the organization's representations, practices, policies and intentions. It is unjust and unfair to every Scientologist and everyone to whom the organization makes its representations that I am barred from making my knowledge known concerning that fraud.

While I am barred from telling the truth about Scientology and my experiences, the organization may say whatever it wants about me and my experiences, no matter how false and defamatory. Scientology claims that I may not respond to its falsehoods and libels, and that if I do respond I must pay it \$50,000 for each response, plus go to jail. That is unfair and unjust.

Scientology claims to be a religion, and organized for strictly religious purposes. People's experiences inside Scientology are "religious experiences." The organization's use of the law to prevent me from sharing in any way my religious experiences is a constitutionally impermissible violation of the religious expression and religious establishment clauses. The equivalent would be prohibiting someone, for any reason, from discussing Jesus Christ or God Himself. That is unfair and unjust.

Scientology promised, in order to get me to sign its "settlement agreement" that it would eliminate fair game, stop attacking people completely. The organization did not cease fair gaming people, but continues this obnoxious and dangerous doctrine to this day. I am still a target of fair game, as are countless other innocent people. That is unfair and unjust.

But what if I were the last person on earth who had the knowledge I have; or what if I were the last person on earth who had a key to preventing a global catastrophe? In the realm of religion, of spirit, of truth, of possibility, of God, no cult and no court can say that ain't so. It is unfair, unjust and unwise to attempt do so. Everyone's communications must be treated as if they have earth-saving importance. Nobody has to nor can be made to listen, but no one can or should be stopped from saying what he's called to say. (Please don't enter here stupidities like yelling fire in the proverbial crowded theater.)

That is why I am in Canada, and that is why I will say what I'm

called to say. To do otherwise is unfair and unjust.

Gerry Armstrong

In Hubbard Communications Office Technical Bulletin of 22 July 1956, L. Ron Hubbard stated:

"This is true --

1. We have created the (ital) permanent (end ital) stable clear.
2. In creating him we have a homo novis in the full sense, not just an Operating Thetan.
3. We now know more than life. An oddity indeed.
4. We now know more about psychiatry than psychiatrists. We can brainwash faster than the Russians (20 secs to total amnesia against three years to slightly confused loyalty."

While inside Scientology I read and studied that bulletin. It was also published in the red "tech volumes."

Either Hubbard lied, or Scientology can brainwash in twenty seconds, or both. Apologists' choice.

Gerry

Tilman asked the following question which I found on Deja News.
(I don't get all ars posts on my news reader.)

In <3403bcf7.13770246@news.rapidnet.net>, armstrong@ntonline.com
(gerry
armstrong) wrote:

>also hired individuals who followed and surveilled GA, assaulted
>him, struck him bodily with a car, and attempted to involve him
>in a freeway accident.

"Can you tell us more about this? I would like to hear the name
of these people."

The PIs hired by Scientology who harassed my wife Jocelyn and me
in the summer of 1982 were from the Tin Goose Agency in southern
California.

I think the principles in the company were Gene Tinch and Henry
Goosen, who, I also think, they were ex LA law enforcement
officers.

Scientology had PIs stake out our home, follow us and generally
terrify us around the clock for about a month period in 1982,
until a LA Superior Court judge let them know they better knock
it off.

I was never able to get the names of the individuals who made the
criminal contact with me, although I saw one of them later by
chance on TV.

I picked up surveillance outside my home in Costa Mesa,
California sometime in or around May, 1982. In August I was able
to detain a PI by putting my leg under his car wheel and having
Jocelyn call the local police. I was able to get this person's
name through the police, although I don't have it with me at this
time. Greg something, I believe.

Later in August I again spotted surveillance across the highway
from my home; a guy with binoculars in a car. I slipped out of my
home with a camera, without the guy knowing. I approached him,
taking his photo as I moved toward him. He moved toward me and
pushed me around with his hands, striking my chest. I yelled
assault, told him to take his hands off me, waved at passing
traffic, and yelled to Jocelyn, not knowing if she could hear me.
The guy then began pushing me around with his body. I figured he
wanted to maneuver me behind nearby buildings out of sight of
passers-by, where he could take care of me. I can't help being
unlarge, unintimidating and unable to beat on much bigger
bullies. Thankfully Jocelyn rolled up in our car, and the guy
took off.

Some years later I saw the guy on TV acting as corner man for
Michael Nunn. Nunn was a world class boxer, I think middle

weight, and may have held a title or two. He was then managed by the Tin Goose group. Tinch and Goosen had apparently branched out into training/managing professional boxers. The corner man, who had assaulted me in 1982, was identified by the commentator as a brother of Henry Goosen.

On another occasion, also in August, 1982, another one of the PIs was following Jocelyn and me during our lunch break from our work. We both were very weary and distraught from the 24 hr a day following and spying on us. I stopped and got out of our car and approached his vehicle. He swung toward me and smacked my elbow with the side of his car.

The same guy later got right in front of us on the highway and slammed on his brakes. We had an old Datsun 510, in not very good condition. A first car after the Sea Org; which other SO escapees would understand. So the incident was pretty terrifying.

We went past the guy; then he came along side and crossed into our lane as if to force us off the highway. I think we all were very fortunate that no crash occurred, because this guy was doing things which were reckless and criminal.

I have photos (not with me) of four of the PIs and a detailed chronology of these events and the rest of the harassment from that period.

That period, by the way, is during David Miscavige's running of Scientology, and running of its PIs. These events cannot be ascribed to the criminal Guardian Office.

Gerry

On 24 Sep 1997 21:45:15 GMT, writer@eskimo.com (Robert Vaughn Young) wrote:

>

>As to the RPF's RPF, there is one and I was assigned to it. It is where
>one goes when one first goes to the RPF. Let me tell you about it, using
>their definitions.

I was in the RPF twice, first for 17 months in Clearwater, then for 8 months at La Quinta and Gilman, both times assigned on the personal order of Hubbard. The first time was for "insubordination" for "attacking the GO," the second for "joking" about Hubbard's movies. During most of my first "assignment" I was the "Bosun," the assignee in charge of the RPF. During my second "assignment" I was the RPF MAA, second in command under the Bosun, responsible for RPF "ethics."

During those periods, most people were not initially assigned to the RPF's RPF. A person could be, if Hubbard or DM was being particularly cruel to the person. Someone could also be sent to the RPF's RPF, as Vaughn says, if he took his RPF assignment too lightly. That, by the way, is the truth to be returned to the Scientology apologists/OSA spokespeople who claim that RPF assignment was a sort of privilege for spiritual reasons. It was PUNISHMENT. Anyone who believed and acted as if the RPF were a privilege for spiritual purposes got the RPF's RPF.

It was generally while in the RPF that assignments were made to the RPF's RPF. This could be for any infraction. There was always a great deal of pressure on the RPF execs (Bosun and MAA) from the CMO and Hubbard missions to be ruthless and uncaring with the other RPF members. If the Bosun didn't assign an "out-ethics" RPF member to the RPF's RPF the Bosun could find himself stripped of his post and himself assigned to the RPF's RPF. I was once stripped of the post and assigned an extra month in the RPF for "allowing slack discipline." The assignment of extra time in the RPF should lay to rest the idea that the RPF was anything but PUNISHMENT.

I have seen people picked up bodily by four big men and taken to the RPF kicking, struggling and screaming in protest. That is not "voluntary" as Scientology's spokespeople claim. I have seen many people held and guarded. All mail out of the RPF was read by the MAA, and any mail in could be. Telephone calls to family were by permission and were monitored.

The RPF is something Germany and every government should look at because the citizens of every country are being assigned to these US-based gulags in violation of basic human rights. People assigned are not free to leave but are held, guarded, and must sign lists of their "crimes" culled from their pc folders before they are routed out. Until, among other reforms Scientology must

make, the organization abolishes its RPFs, freedom of religion in the US is a lie. The US has created a freedom for unholy corporations to persecute individuals for "religious" reasons. The US has allowed its Constitutional guarantee of religious freedom to be perverted by money-motivated corporate lawyers.

Everything else Vaughn has stated is completely accurate. The RPF is degrading, dangerous, debilitating and the sick product of a deluded megalomaniac.

> Are you reading this Chick Corea and John Travolta when you
>complain about how Scientologists are treated?]

>
>

When Corea and Travolta, Cruise and any other spokesman for Scientology promotes this organization they are sending someone to an RPF gulag.

>And also pass it on to those who say there is no form of "cult
mind
>control" that goes on in Scientology. Better yet, let THEM do
the RPF's
>RPF and keep them there until they change THEIR minds "of their
own
>self-determinism" and let's see what they say.

>

The RPF, the RPF's RPF and all of their bizarre punishments were intended to break the spirit of anyone Hubbard or his cultish capos felt needed breaking. People could be assigned for nothing more than a needle movement on the organization's "religious artifact." People could be assigned for a "low OCA," the "personality test" with which the cult recruits raw meat. People could not get out of the RPF until they had become so compliant that they thanked their punishers for the punishment, and wrote a success story (to be used against them in the future if they ever realized they had been abused and sought redress for that abuse).

It is a tribute to the human spirit that such a diabolical enterprise is so ineffective. Many people are speaking out against these abuses, and they will be stopped.

>Robert Vaughn Young
>writer@eskimo.com
>

Gerry Armstrong

Everyone knows that Hubbard said that he had to lie to people to control them.

He was only telling a bit of his truth; that is, he was lying. The way Hubbard really controlled people and his replacement model controls them is to get them to lie for him. Once a person lies for the cult he is in its control. If he quits lying for the cult he is no longer in its control, and no longer a Scientologist.

Having people lie starts with their first success story. If they tell the truth they cannot continue in Scientology. They lie after every auditing session and after every level up the grade chart. They lie about abilities gained and "OT phenomena." They lie about Scientology every time they "disseminate."

As people advance in Scientology they are required to tell different organizational lies. The top Scientologists, those who have advanced farthest in this "applied religious philosophy," are required to commit perjury in court. They lie about who runs Scientology. They lie about its history, nature, finances and intentions. They lie about the GO, OSA, Hubbard and Miscavige.

If anyone refuses to tell a lie he is hauled "off lines" and could easily become fair game. He knows that if that happens everyone in the organization will lie about him.

Scientology's black PR/DA practices are in large part intended for the controlled cult members. As long as the OSA PR and legal operatives spread lies about people who are telling the truth about the cult, these operatives remain controlled. Get all Scientologists to lie about the people telling the truth and you control all Scientologists. If the operatives or Scientologists refuse to spread the black PR they are out of control and must be themselves black PRed lest their dedication to the truth infect the cult.

It is an organization based on telling lies. All of its lies trace back to Hubbard and Miscavige, the source and the source's apprentice. They are also the chain of lies' weakest links. Who but fearful criminals require that the people in their control lie for them? And who but criminals would have such disdain for people in their care?

Gerry

>On 27 Oct 1997 tilman@berlin.snafu.de (Tilman Hausherr) wrote:
 >
 >
 >
 >I asked Gerry Armstrong if he did appear "seemingly naked" in a
 >newspaper, as clam publications said. He explained that this DA
 shows
 >very well how DA works. He had founded a movement called the
 >"renunciators" and had sent press releases about this to the
 media.
 > The Marin county newspaper interviewed him and made a foto of
 him
 >in the lotus position behind a huge globe. Because the globe was
 so
 > big, most of his body couldn't be seen - he was wearing Gym
 shorts,
 > he wasn't naked at all. Eugene Ingram (who, btw, once told
 Gerry that
 >he would get a bullet between his eyes) even visited the paper
 and
 >interviewed the journalist / fotographers, so scientology knew
 very well
 > that Gerry wasn't naked.
 >
 >
 >
 >Tilman

In its black propaganda packs on me, Scientology continually makes the "apparently naked" charge:

"Since the case (Armstrong I, LASC No. C 420153) was heard, Armstrong has adopted a degraded life-style and developed some odd financial ideas. He is the self-proclaimed founder of the "Organization of United Renunciants." In November 1992 the Marin Independent Journal attempted to explain Armstrong's philosophy of life in an article entitled "Is money the root of problems?" The story featured a photograph of an apparently naked Armstrong, eyes closed and smiling, sitting in a lotus position embracing an enormous globe."

In one of its black propaganda pack on Judge Breckenridge, the cult writes:

" Since the case (Armstrong I) was heard, Armstrong has adopted a hippy life-style. He is the self-proclaimed founder of the "Organization of United Renunciants." A November 1992 article in the Marin Independent Journal featured a photograph of an apparently naked Armstrong, eyes closed and smiling, sitting in a lotus position embracing a globe."

At other times the cult drops the "apparently" or "seemingly" and

exposes its raw villainy.

On August 5, 1993, Heber Jentzsch writes to Carol Fracassa, producer at Entertainment Television in LA:

"[Armstrong] has no relation to art or artists and has no history of being published anywhere - except, of course for the photo of himself, nude, hugging the globe of the world and promoting the idea that everyone should give away what money they have.

The documents are attached."

The same cult black PR publication attacking Factnet which contained the cult's grotesque characterization of the "pig dream," (see post "For Grady with Love and Squalor") continued:

"On November 11, 1992, in the Marin Independent Journal there was an article on Gerald Armstrong titled "Is Money The Root of Problems." In the article there is a picture of Armstrong (ital)in the nude holding a globe(end ital)."

In a letter on OSA stationery dated May 9, 1994 to Charles Collier-Wright of Mirror Group Newspapers in the UK, Mike Rinder, stripped of any seemliness, writes:

"By involving himself with Church of Scientology litigation, Mr. Armstrong is in violation of a legal agreement he made in 1986. Were the Mirror to call him as a witness, your client would become a party to that violation. However, your client would be advised not to rely on information from Mr. Armstrong. He has now distinguished himself by posing naked in a newspaper claiming that the solution to the national debt is for everyone in the United States to simply renounce money. He claims himself to be the "Founder of the Organization of United Renunciants."

In the same letter Rinder also attacks Robert Vaughn Young, Garry Scarff, Hana and Jerry Whitfield, Richard and Vicki Aznaran, Lawrence Wollersheim, Scott Mayer and Graham Berry. Rinder copies the letter to Gerrard Tyrell of Harbottle & Lewis, and Gerald Feffer of Williams and Connolly.

Last month OSA scrub Lynn Farny passed the same seemingly naked lie on to Channel 4 in the cult's effort to derail the Secret Life of L. Ron Goodbugger.

As Tilman says, I wasn't physically naked when photographed for the Marin IJ article, but was wearing a pair of running shorts. The cult knew this because its iniquitous intimidator Ingram interviewed the IJ photographer Frank Frost within a few days of the article appearing. I protested to Rinder during a meeting in 1994 that I wasn't nude in the photo and that Scientology knew I wasn't. He acknowledged this, and in fact acknowledged that what Scientology was doing to me was black PR. He also said that they were going to continue to black PR me until I was silent.

But I figure that if the unadorned truth won't curb bare-faced liars rather than be shuddered into a straitjacket I'd just let it all hang out.

Gerry

On Wed, 29 Oct 1997 11:18:05 GMT, tilman@berlin.snafu.de (Tilman Hausherr) wrote:

>Armstrong said that in the worst case, he might owe scientology
>billions, because he must pay \$50,000 for every "violation". He
once

>wrote a letter to Miscavige and sent copies to 18 other people.

>Scientology then asked him to pay \$900,000. With that logic, a
usenet

>post would have an even higher price, as it would be read by
many

>thousand people.

>

>

Believe it or not!

Yes, I "owe" the cult of greed (R), in their estimation,
somewhere in the neighborhood of \$5,000,000,000,000. That's five
trillion, not five billion, Tilman. As more people get on the
net, read my posts and find me quoted here and there, this figure
will continue to escalate.

One of the reasons I speak is to continue to point out how
ridiculous the cult's gag orders and their liquidated damages
clauses are. For a liquidated damages provision to be legally
binding there must be a reasonable relationship between the
actual damage done and the amount of the liquidated damages.
Since whatever I've said or written about the cult cannot
possibly be translated into 5 trillion dollars in actual damages,
their liquidated damages clause will fall. Not only for me but
for every Scientologist or non-Scientologist the cult binds to
silence by "contract," and by threat.

When the cult stops trying to prevent people from talking about
them people will have little to say.

I'll post separately the 1992 \$900,000 letter to David Miscavige
Tilman mentions.

Gerry

On Tue, 28 Oct 1997 07:20:53 +0100, jensting@imaginet.fr (Jens Tingleff) wrote:

>In article <347058a1.51057732@news.snafu.de>,
tilman@berlin.snafu.de

>(Tilman Hausherr) wrote:

>

>> (This info from before the conference)

>>

>> Gerry Armstrong is collecting packages of all the food he is eating, and

>> has done this for many years. He takes them home, cleans them, and

>> collects them. His plan is that some day he will put it all on the grass

>> arranged in a symbol, then get up in a balloon and photograph it, then

>> sell posters of the foto, with one "object" attached.

>>

>

>He used to live in San Fran, didn't he? Say no More... Actually, I like the

>idea, I just hope he doesn't take it as seriously as the buyers ;-) ;-) ;-)

>

Well, now that I have been publicly exposed, I suppose a response is warranted, so here goes.

I didn't live in SF, but in Sleepy Hollow and then San Anselmo, both in Marin County, north of and across the Golden Gate Bridge from the City. Having admitted to living in Marin, however, as you say, "Say no more," could also be said, or probably even go without saying.

I do take it very seriously, in part because it has been so much effort and trouble; and in part because it's so painfully hilarious. Steve Whitlatch, who, unhappily for me at least, has disappeared from ars, and who should, I would vote, be enticed back, perhaps with promises of our better behavior, has seen my Marin trash mountain, and can attest to its majesty.

>> In his bankruptcy case he had to list his assets, and also listed this

>> collection. Scientology wanted to get it (although it has no actual \$\$

>> value currently)! To explain his point of view, he then took all these

>> "objects" in huge bags inside the court to show the judge.

>>

>> Scientology lost and got nothing.

>

>ROTFLMAO!!!!

>

> Jens

>

I started this project in early 1987 shortly after the December, 1986 so-called settlement with my former cult, thinking then that I had the time, space, locational stability and peace to undertake such a project.

I call it my Consumed Consumables Container Collection (R), and the final product a "Consumer's Mandala." (R) Americans are known everywhere as notorious consumers, and this project contains an underlying message of consummate consumerism.

So, within reason and reasonable logistics, every bottle, box, wrapper, tube, bag, dispenser, can and carton of whatever I have consumed, and some of the cups, utensils and other stuff related to my almost all-consuming consumption, I have saved and stored. I clean each object, as Tilman notes; then I sign it, which takes a little time because my signature takes a little time, and I usually date it and indicate where and the commensals with whom its contents were consumed.

I have something over 400 boxes of this stuff, all clean and carefully packed, and I have acquired a commensurate appreciation for the art and technology of the packaging industry. I believe that the various companies represented in the collection, which probably favors breweries and bread makers more than confectioners and caviar canners, may want to participate in the project to promote their products.

Scientology sued me in the bankruptcy court, as Tilman mentioned, seeking to prevent me from discharging my \$630,000+ "debt" to the cult resulting from the illegal judgment against me in the California State Court enforcing the illegal "settlement agreement." Basing its case in the US Bankruptcy Court on bogus charges, the organization sought to seize my art, comprising my container collection, as well as my other assets, including some intellectual properties, particularly my formula for the Unified Field.

The cult made a lot of noise in the bankruptcy court about my statements in other legal contexts that my art, including the containers, has considerable commercial value. I argued that although it has such value to me, it couldn't have any commercial value to the cult. Was Scientology, after all, going to have its people lay out my trash on a big lawn in Napa County, rent a hot air balloon, go up in the air and photograph the stuff, create a poster, and market and sell the poster and the trash? Would they really do that for Gerry Armstrong, whom they vilify as a psychotic criminal? Imagine the ads in "Source" and "Impact:" "Get your Gerry Armstrong (TM) Special OT Junk Poster (C) NOW. Prices go up 10% next month."

So I took four big boxes (not bags as Tilman says) of these things to my trial in the bankruptcy case in February, 1996. Initially I ticked off the bankruptcy court judge because I was

late, and he started the trial without me. My lateness was caused by a long delay getting these boxes of bottles, cans and other junk through the courtroom metal detector. I had to open the boxes and let the courthouse security people, in somewhat wild-eyed disbelief, paw through everything.

But after a one day trial the judge issued a decision in my favor, my "debt" to the cult was discharged, and I got to keep my trash. For the ARSCC Historical Research Department Investigators, the file is: Scientology v. Armstrong, US Bankruptcy Court, Northern District of California (Santa Rosa), Case No. 95-10911 aj. 99 South E Street, Santa Rosa, CA 95404. Alan Jaroslovsky, Judge. Check it out.

My container collecting has gone on longer than many times along the way I had thought it would or wanted it to. I have thought on many occasions that it was time, always perhaps next spring, to complete the project. But Scientology has shown that it will attack and attempt to destroy almost everything I am involved in, so I have delayed the commercial culmination and presentation of the project until the cult's attacks end forever. In the meantime I eat, drink and collect; and some day I will stop.

I just brought back some very cool containers from Germany: beer bottles and coasters, wine bottles, mineral water bottles, etc., and all the miniature salad dressing and cream containers, plastic wine cups, wrappers, stir sticks and other valuable stuff from the Lufthansa flights. I also have some extraordinary eisbein bones, which I was able, only by unwitting forgetfulness, to get through Canadian Customs. Although they are not technically containers they are so closely related to a wonderful meal I consumed in Berlin and so aesthetically pleasing I will give them a special place in the mandala.

All this is really related to the environmental side of my life, and offtopic on ars had Scientology's attempt to seize the collection not made it ontopic. I am also the founder of the Runners Against Trash (RAT) (R), for which Rodale Press gave me its Golden Shoe Award (see Runners World magazine of February, 1995), and the Organization of United Renunciants (OUR) (R), which I see Tilman also mentioned in another post. I will explain this activity shortly.

But the container collection is also fiscally serious because everything I consume, the containers being art, is tax deductible. The more and better I eat, the larger my deductions. Since I don't have much actual capacity, as opposed, for example, to Big Bad Ron (R), I pad my deductables by running a lot so I can consume more. In America, at least, road races are also an amazing source of snack food bags and wrappers and other containers. On the other hand, being, as much as is practical at this time, a renunciant, and having little desire for monetary wealth, I do not obtain tremendous tax advantages from this concept. If a very wealthy person, Bill Gates for example, were

to save as art all the containers of everything he consumed, he really could significantly reduce his tax load. Bill would also probably have way more caviar tins in his collection.

Gerry

Subject: Trillions to the Cult, or Merely Irrepressible
Samizdat?
From: armstrong@ntonline.com (gerry armstrong)
Date: 1997/11/08
Message-ID: <34640a6b.50764211@news.dowco.com>
Newsgroups: alt.religion.scientology
[More Headers]

Further to the discussion regarding my liquidated damages
"debt" to Scierntology.

I wrote this letter, which came to be known as my "Christmas
Manifesto," and sent it to David Miscavige, various scientology
entities, and 19 non-scientology people. What happened after my
sending it is described following the letter.

[Quote]

December 22, 1992

David Miscavige and all other individuals who participate in the
control of Scientology
C/O Laurie J. Bartilson, Esquire
Bowles & Moxon
6255 Sunset Blvd., Suite 2000
Los Angeles, CA 90028

Re: Nothling v. Scientology

Dear David and all others involved:

I am writing this to you, and the various copy recipients
listed below, because there are certain things it is fair that
you know. Although it is the trial in the Nothling case, which,
I understand, is set for early February, that has moved me to
write at this time, the idea of writing has made addressing a
number of other subjects also timely.

You will recall that in June of 1991 when Malcolm Nothling
called me and asked me to testify in his case in Johannesburg I
wrote to the organization via Eric Lieberman to see if by
initiating communication on the subject you might see that there
was an answer to your litigation problems different from the one
you and your erstwhile leader had been believing in and pursuing
as long as any of us can remember.

Mr. Lieberman wrote back, essentially advising me you said
stick it in my ear, and that more, not less litigation was going
to be the same old solution; and to not expect communication
other than the solidest of sorts. Copies of Mr. Lieberman's and
my letters are enclosed herewith.

I did travel to South Africa in 1991 to testify, as you

know, but the trial was postponed on the organization's motion. Now it's set to happen again. Again Mr. Nothling has asked me to testify, again I have agreed, and again I am writing you to see if there is any sense in attempting to unfoment this litigation.

Your public attack line that Gerald Armstrong foments litigation against you is particularly hurtful because of what I have done and continue to do to unfoment litigation. Even my signing of your settlement agreement was, in the face of your intent to hurt me, which fact is settled by the agreement itself, an act only of unfomentation.

You all should take a good hard look at the hurt your practices, certainly your litigation practices, cause in the world. And you don't have to desist in them because of anything I've said. You can knock off those bad practices for any reason you want, including because they don't work and make no sense.

All the decent people, believe me, in your organization want you to get out of the stupid attack-the-attacker business, and they'd salute you for getting the organization out of that silliness, but they're too frightened. You shouldn't frighten good people that way. It's cruel. And any thinking soul knows that you guys are only acting out of fear, so you really are not fooling anyone with your blindness and bluster.

I realize you've put your faith in really bad things, like lies and PR, threats and bullying, and really mean people, like Gene Ingram. And I'm aware that having put your faith in badness for so long, and spent so many millions of dollars to have so many bad lawyers make so many bad decisions and add so much to their brethren's bad name, it can seem impossible to quit. But you must. All it will take is the willingness to unfoment your litigation.

Eugene M. Ingram has done such nasty things to so many people in the service of your organization, you and he should be spanked. His terrible charge at the CAN convention that I have AIDS is heartbreaking, not because I have AIDS, which I don't, but because your pet pit viper personalizes and focuses your organization's institutionalized hatred.

By accusing me of having AIDS, you and Ingram attack not just me, you attack the many people whose lives have been touched by this disease, or for that matter touched by your organization, and you attack yourself. Your similar-veined attacks on other people of good will at the CAN conference, like Father Kent Burtner, has brought your organization to ignomy.

But the target of faith can be rechosen. And that is where I urge sense and unfomentation. Put your faith in what is real, what is true, what can always be depended on. Put your faith in what in people is true, unchanging and ceaselessly loving. Putting your faith in lies, PR, threats, bullying and bullies you

will always betray yourself because you put your faith in nothing; and you and every being everywhere have a right to everything that nothing isn't.

Likewise don't put your faith in litigation or your use of the courts to harass. It is possible to be faithful to a higher ideal than wins in court. If you have put your faith in lies, leverage, advantage and bullying to secure a win, you have gained nothing. If you put your faith in truth, hope, charity, love, no matter the courtroom outcome you have everything; that's religion.

Since the 1991 almost trial in the Nothling case the California Court of Appeal issued its opinion in the appeal you took from the Breckenridge decision in Armstrong I, the California Supreme Court denied review, and the Court of Appeal denied your motion to seal the appellate record. You brought and lost the motion to enforce the settlement agreement before Judge Geernaert in Armstrong I, and then you sued me to enforce it in Armstrong II.

In May Judge Sohigian issued his ruling refusing to enforce the agreement, although enjoining me from testifying unless pursuant to a subpoena. He also ruled that I did not have to not make myself amenable to service of process. I will supply a copy of the Breckenridge decision, the Armstrong opinion and the Sohigian injunction to any of the recipients of this letter upon request.

Because you didn't appeal from the Sohigian injunction, you have accepted it. I believe as well that for a valueless desire for a valueless win at any cost you also accepted his dicta; e.g. "involves abusing people who are weak," "involves techniques of coercion," "a very, very substantial deviation between [your] conduct and standards of ordinary, courteous conduct and standards of ordinary, honest behavior," "be sure you cut the deck," "make sure to count all the chips."

As a result, I consider myself free to do anything anyone can, except testify absent a subpoena. Much of what I am permitted do I am going to do. I am going to write freely, speak freely, publish, talk to the media, associate freely, and continue, until you put your faith in something more religious than what is bad in jurisprudence, to confront the injustice you bring to court.

In the next month or so I expect to initiate speaking or media events to help pay the enormous costs of this litigation. And I expect to promote my legal position within the publishing industry, because my story and my writings on the subject are literarily and commercially worthy.

I will continue to associate with and befriend all those people I consider you attack unjustly and senselessly. I will

make my knowledge and support available to the Cult Awareness Network, a group of people of good will you vilify, in all the litigation you have fomented against them. I will make my knowledge and support available to any Scientologist who is afraid to go anywhere else for understanding, and to the families of Scientologists your organization has estranged. I will even make my knowledge and support available to entities like Time and people like Rich Behar in their defenses from your attacks.

I will, nevertheless, remain available to do whatever I can to unfoment your litigation. I will meet with you, talk with you, help you to find a better solution to your problems. Because of your decision to not have anyone communicate with me, no one from your organization has. I get a little lawyer contact, lots of PI BS, an OSA hearing or deposition attender, enough psychic skirmishes for an army, but, for the life of me, no real people.

In 1991, fantastically, I was the only person in the world, other than Malcolm Nothling himself, who was willing to testify at his trial. And that was enough reason to go. In February 1993, although at this trial I probably won't be the only person willing to testify, there will still be ample reasons to go, unless the case can be resolved.

I really would rather there was no trial and I really would rather not go. Lord knows this last period has been overwhelming and the litigation behemoth terrifying; and Lord knows I have my own calling, which has nothing to do with your legal problems. So I'm willing to do a lot to unfoment the Nothling litigation, and all the tangled legal webs you've woven. But I sure can't do much if you continue to see legal warfare as the solution to your problems and continue to pay the millions your legal mercenaries say the warfare costs.

I am aware that with enough money to enough lawyers you, the leaders of your organization, can hide yourselves and make your roles in your trumped-up war seem very important. There is no doubt this is desirable, it just isn't fair. The real purpose of your little war is to facilitate your doing something different from Scientology, while all those whom you control must go through the daily grind you say you're above.

I don't fault you for doing something different from Scientology, but I do not find acceptable your holding Scientologists in bondage to your catastrophic cause, enforcing your lie that you have their best interests in mind, robbing their years of youth and vigor, and putting them at risk while you show up at the occasional ribbon cutting ceremony, lunch with lawyers and the like, sucker celebs, run PIs and intel ops, conspire, cheat, lie, steal, bully and destroy. I urge something more creative as a better idea.

Your hardworking staff members and people of good will

around the world who have supported you financially and spiritually will not for much longer be fooled by your foolishness and will stop believing your lies. They will speak to each other, they will speak out against your suppression, and they will act to free themselves and their friends. You cannot much longer, as we move societally into the age of wisdom, cynically and sillily intimidate good people with threat and suppress good people with lies.

There is the matter of mitigation of damages which, because you insist your lawyers tell you what you pay them to say, you may not have heard or yet understood. In that by the Sohigian ruling I am permitted to speak freely, write freely, publish freely, associate freely, when, it could be argued, and you have, that prior to the ruling and pursuant to the settlement agreement I was not so permitted, I have, in your attempt to enforce the agreement, prevailed.

By not appealing the Sohigian ruling you have acquiesced thereto. I am therefore due costs and fees in Armstrong II plus the costs and fees you already owe in your earlier losing and unappealed effort in Armstrong I. But in addition to the fees and costs now owing, and increasing as you protract this already lost litigation, there is the cumulative effect of your legal onslaught which, continuing after the case was lost, if not before, is in every minute malicious.

Gerald Armstrong and The Gerald Armstrong Corporation (TGAC) must also mitigate their damages. I have a duty, therefore, to end this litigation as quickly as possible. Thus I write to so many organizational recipients; thus I canvass to see if within the organization's many parts, all put at risk by their leaders' asininity and mean-spiritedness, there are people of good will who will see sense in what is in their best interest.

That after the Sohigian ruling you sued TGAC (pronounce that Tee-Gee-Ack) is silly and self-destructive. The only thing in the world Gerald Armstrong, individual, is prohibited from doing by the "injunction," is testifying about his Scientology history and knowledge without first accepting the perfunctory subpoena. TGAC only came into existence in 1987, six years after Gerald Armstrong's organization experiences ended, and a year after the Armstrong I litigation "settled."

TGAC cannot testify, with or without subpoena, about any Scientology experiences, because it has had, aside from those which have flowed from your lawsuit, none. Since no one, including TGAC, is prohibited by Sohigian from doing any of the things TGAC actually is capable of doing, it is free to do everything anyone or any other corporation can; and by not appealing the injunction you have so agreed. Thus, having no conceivably legitimate claim against TGAC, you depend on one manufactured from madness, and you must therefore dismiss the mess you've made.

There is also, as mentioned above, the fact that in order to defend myself from your attacks and to fund the defense of the litigation you have fomented I must speak and must publish. I'm sure you understand that I remain completely confident that no court, other than the odd one your mercenaries are able to compromise with bucks, babes or bull, will order me to not defend myself.

I realize you will probably claim to be offended by everything I've written in this letter. I can't do much about that because you seem to take offense no matter what I say or write, or don't. For, inter alia, that reason I haven't said or written it differently. I really don't blame you for being offended and I don't expect you not to be offended; nor will I be offended if you are. I think my position is obvious and I think peace is worth doing something about, even if the fomenters of war are offended. I've used the words I've used because to me they make sense and they're a facet of my craft.

This letter is not really, however you may take it, a complaint nor an attack. It is an effort to unfoment your litigation, into which I have been, albeit for some God-given purpose, drawn. So, neither forgetting nor ignoring Judge Sohigian's admonition not to settle Armstrong II, but still hoping, with my heart crossed, here is my proposal:

1. Settle the Nothling case;
2. Settle with Ed Roberts;
3. Dismiss your complaint against TGAC and Gerald Armstrong;
4. Remove all your bar complaints against Ford Greene;
5. Pay my attorney fees and costs;
6. We will dismiss the cross-complaint and appeal;
7. Cancel the agreement;
8. Return all materials you've stolen from me at any time;
9. Pay me whatever you want, including, but not limited to, nothing.

1. Malcolm Nothling has a claim and he has survived a lot to get to trial. His costs, not much by US litigation standards, must be recognized, and he must be made whole financially, ethically and publicly. I am convinced that his daughter, but for your control of her mother and her life, would enjoy a

healthy, loving relationship with her father. Therefore you must do whatever is within your power to reunite them.

2. You know about the Ed Roberts case because Ms. Bartilson interrogated me about my providing assistance to Mr. Roberts in my last series of depositions in Armstrong II, and one of your lawyers, Marcello Di Mauro, in earlier times communicated about him with Ford Greene. Ed Roberts is a friend of mine who was sucked dry and flat out robbed by your registrars on the way to an up- or downstat week of no consequence to anyone as it turns out, and always does, but Ed.

I have found myself in the silly position of being the only person in the world willing to help Mr. Roberts against your organization. Again, I have no desire to have Mr. Roberts engage you in litigation. In fact his situation can be resolved without your fomenting not only more litigation, but more ill will and silliness. For you it is merely an accounting matter. You ripped Mr. Roberts off; now pay him what is needed to make him whole again.

Mr. Roberts' case of Scientology lies, threats, treachery and thievery, his own money then used to pay your pitiless pettifoggers to prevent him from anything resembling redress, is being played and replayed every day of the year in your orgs. I would think that the three or so million you wasted on your inane USA Today ads to counter Richard Behar's few good pages could have taken care of three hundred Mr. Roberts and done a heap of good.

All your ads did was a heap of bad: more lies, more hate, more embarrassment for Scientologists everywhere, another dead forest, and an uncharitable little delay to your victims before they are made whole. The Ed Roberts case is, in my opinion, the proof of Time's theme: that you are - all of you at the top of your organization - a cult of greed. But worse, you squander your plunder, as witness Toronto, starve the good and fatten your PIs and proctors and their proctologists. And all with the fatuous excuse of a right to defend wrongness and attack rightness because your "religion's" stupidity is, in our courts of law, beyond question.

Anyway I want to have Ed's needs taken care of toot sweet. He probably wouldn't think less of you if you didn't apologize, but I think it's a good idea and sure couldn't hurt.

3. I don't care what order everything is done in. I think whatever is most practical, sensible and ergonomically sound is the way to approach this particular program, which, I'm sure can be wrapped up in a couple of days.

4. This is easy. These Ingram-generated efforts have only served to shine a light on your invidiously scheming enterprise. All your similarly baseless bar complaints against my other

lawyer, Michael Flynn, came to nothing. You should learn from the earthworms. Filing no spurious bar complaints whatsoever they demonstrate their superior philosophy.

5. Although they're in the range of, I don't think fees and costs are over \$500,000. Clearly nothing is going to happen unless you cover my attorneys' fees and costs. To leave me with that indebtedness is unfair and unworkable. You will recall that I made a proposal in 1984, being then scared and weak: pay my lawyers' fees and costs of, I guessed, \$150,000, and I'll quit. You, and in those days, Hubbard, said no way. I, less scared and much stronger, urge you to choose again.

6. Dismissal of the cross-complaint is easy. I'll take care of it.

8. I'm aware this may for a long time remain a pettiness you'd rather not confront. But I can guarantee that if you return my materials - the Hubbard letters manuscript, the Cones, all the other materials you and your PIs have stolen from me over the years, I will not bring criminal charges, and I won't even bring the subject up again.

9. You have to cancel the settlement agreement in order to demonstrate to yourselves that it was the wrong thing in which to put your faith. You will notice that when you cancel the agreement nothing will happen. Yet you will have freed me. And that is what you should make Scientology's only business: freeing people. You will also observe that when you free me you free yourselves; in fact you cannot yourselves be free unless you free me.

Regarding my relationship with you after you cancel the agreement, that is where you must reassert your faith. Have the faith that I will neither say nor write worse things about you if you free me to do so. As you know I can say some pretty pointed things about you now just because you won't cancel that degrading document. Put faith in what occurs in silence. Put faith in the inevitable.

7. You decide. If you think I did a lousy job unfomenting your litigation, pay me zip. Even if it all works for everyone, timing inspired and ideas a Godsend, you don't have to pay me anything. I generally don't refuse what's offered. You know how much I'm worth.

I haven't forgotten Wollersheim, Yanny I & II, the Aznarans, the CAN litigation, claimants all over the place, your government lawsuits, the rest of the settlement signatories, your taxes, nor your image and media distress, and I think it's appropriate to say that I can help you unfoment those problems as well. I would, of course, need half a chance.

If you look deep in your hearts I believe you'll find you

really do not want Scientology's legacy to be one of suppression; suppression of the Constitution, human dignity, truth, religion, justice, even suppression of your own good selves. Wouldn't it be better to be known as the people who ended the madness in peace and style; a radical recognition of the transcendence of quantum scientology. LRH was Newtonian in his physics and relativistic epistemologically. I like to call one aspect of my philosophy, inter alia non-mutual exclusivity.

I believe that everyone will become a person of good will, that everyone already is, has been and will forever be, that there is progress and perfection, hope and reason, that to know who we are we must accept the truth of our relationship to our Creator, that all about us that we made is illusion, that we have reason to be grateful that is so, that our Creator, God, our Father Loves us in the same Love by which He created us and holds us always safe and always loved in that Love, that we, His children, are one and One with Him, that the means by which He is remembered, and hence our relationship, and hence who we are, and hence what we know, is forgiveness, that forgiveness is the recognizing of illusion for what it is, that creation is our nature, and that everything is all there is.

With a wish for peace in 1993, I remain hopeful and,

yours sincerely,

Gerald Armstrong
715 Sir Francis Drake Blvd.
San Anselmo, CA 949650
(415)456-8450

ga

cc: Malcolm Nothling
Ed Roberts
Lawrence Wollersheim
Richard & Vicki Aznaran
Richard Behar
Ford Greene, Esquire
Paul Morantz, Esquire
Joseph A. Yanny, Esquire
Toby L. Plevin, Esquire
Graham E. Berry, Esquire
Stuart Cutler, Esquire
Anthony Laing, Esquire
John C. Elstead, Esquire

Michael J. Flynn, Esquire
Fr. Kent Burtner
Margaret Singer, PhD.
Cult Awareness Network
Daniel A. Leipold, Esquire
Church of Scientology International
Church of Scientology of California
Religious Technology Center
Church of Spiritual Technology
Church of Scientology ASHO
Church of Scientology AOL
Founding Church of Scientology of Washington, D.C.
Church of Scientology Flag Service Organization
Church of Scientology of Arizona
Church of Scientology of Los Angeles
Church of Scientology of Stevens Creek
Church of Scientology of Sacramento
Church of Scientology of San Francisco
Church of Scientology of Washington State
Church of Scientology of Boston
Church of Scientology of Portland
Church of Scientology of New York

[End Quote]

Well, on December 31, 1992 Scientology filed an application for an Order to Show Cause re Contempt, based in part on this letter. Attorney Laurie Bartilson of Bowles & Moxon wrote:

"Armstrong's intention to ignore the May 28 Order was reiterated in a letter sent by Armstrong to plaintiff's counsel, dated December 22, 1992. In that letter, which is copied to his own attorneys but not sent by them, Armstrong threatens that, if he is not paid \$500,000 and this lawsuit dismissed, he intends to travel voluntarily to South Africa to testify against a church of Scientology, give interviews to the media and voluntarily assist anyone and everyone opposing Churches that he can locate."

"(n5) In what can only be described as deliberate harassment, Armstrong also sent copies of the letter to 35 individuals or groups, including anti-Church litigants, such as...."

"In his December 22 letter, Armstrong asserted that he 'is the only person in the world willing to help Mr. Roberts against your organization.' In that letter, Armstrong includes the payment of an unspecified amount to Mr. Roberts as a 'condition' to ending of Armstrong's campaign of harassment against the Church."

The Court should exercise all of its available powers to impress upon Armstrong that its orders mean what

they say and will be enforced, despite the intransigence of an enjoined party. Indeed, incarceration is an unusually viable vehicle for impressing upon Armstrong the import of his obligations, inasmuch as Armstrong has publicly disavowed money as a meaningful or valuable commodity."

On April 5, 1994 Scientology filed its second amended complaint in Armstrong II (LASC No. 052395). Its Fourteenth Cause of Action stated:

"On or about December 22, 1992, Armstrong sent a letter to, inter alia, Malcolm Nothling, Ed Roberts, Lawrence Wollersheim, Richard Aznaran, Vicki Aznaran, Richard Behar, Ford Greene, Paul Morantz, Joseph A. Yanny, Toby L. Plevin, Graham E. Berry, Stuart Cutler, Anthony Laing, John C. Elstead, Fr. Kent Burtner, Margaret Singer, Cult Awareness Network and Daniel A. Leipold. Each of these individuals or organizations is (a) engaged in litigation against plaintiff and/or other Beneficiaries; (b) an avowed adversary of plaintiff and/or other Beneficiaries; and/or (c) an attorney who represents or has represented litigants and/or adversaries of plaintiff and/or other Beneficiaries. [] Said letter violates the Agreement in that it contains purported disclosures by Armstrong of his claimed experiences with Scientology as prohibited by paragraph 7(D).

In addition, the letter devotes an entire section to a description of the earliest action resulting from the breaches of the Settlement Agreement and to a description of the Settlement Agreement itself. The sending of the letter to plaintiff's adversaries violated the provision of paragraph 7(D) of the Agreement.

By reason of the foregoing breach of the Agreement, plaintiff is entitled to \$950,000 in liquidated damages."

On July 29, 1994 LASC Judge Diane Wayne ruled on Scientology's OSC re contempt, which included some ten separate charges. She stated regarding my letter:

"And finally, when read in its totality, the letter of December 22, 1992 does not amount to activity which "assists" in litigation on behalf of Roberts.

The OSC and the Citee, Gerald Armstrong, are discharged."

In my separate statement of disputed and undisputed facts in opposition to one of Scientology's summary adjudication motions

in Marin SC, I cited to the subject letter to support an argument that Scientology's calculation of the liquidated damages is unfathomable.

"In its first amended complaint, Scientology claims that for a single letter Armstrong wrote on December 22, 1992, in which he attempted to bring peace to Scientology's conflict, it is due \$950,000.00 in liquidated damages.

In Scientology's motion it claims that Armstrong "spoke multiple times with Geertz' counsel, Graham Berry, concerning his claimed Scientology knowledge and experiences;" "met with a cadre of other anti-Scientology litigants and would-be witnesses, at Berry's office, wherein all discussed Scientology, their claimed knowledge and experiences;" and "furnished Berry with not one, but two declarations describing his claimed Scientology knowledge and experiences." For all these "breaches" involving all these people Scientology seeks a "mere" \$50,000.00.

To Armstrong, there appears to be no rhyme nor reason to Scientology's calculation of its "damages;" only whim. To Armstrong these unfathomable, whimsical calculations simply demonstrate the ridiculous nature of the "contract," rendered, in Scientology's untrustworthy hands, horribly cruel.

Marin SC Judge Gary W. Thomas, stated in response, in his grant of summary adjudication to Scientology:

" Defendant's evidence does not raise an inference that plaintiff's calculation is "unfathomable" (fourteenth cause of action seeks \$50,000 for each of 18 letters; nineteenth cause of action is based only on declarations, not on other contacts between defendant and attorney/other clients)."

Pardon me?

So I reckon that if I post this thing to a thousand newsgroups, each with say a thousand readers, that's fifty billion simoleons. Or for my European compadres, fifty milliard. And if someone were to put it somewhere for the world to see...

It shows to Scientology that it cannot possibly be damaged by the truth.

But really it's just my humble part in the prayer for laughter everywhere that is samizdat.

Gerry

On 11 Nov 1997 08:56:54 GMT, ronsamigo@aol.com (RonsAmigo) wrote:

>

>gerry armstrong wrote in message
 <3468171d.11921910@news.dowco.com>...

>>On 9 Nov 1997 00:52:08 GMT, "Garry Scarff" <Scarff@iag.net>
 wrote:

>>

>>>gerry armstrong <armstrong@ntonline.com> wrote in article
 >>><3464c4c7.14216677@news.dowco.com>...

>>>> On 8 Nov 1997 07:22:15 GMT, grahameb@aol.com (GrahamEB)
 wrote:

>>

>>

>>>>

>>>>_ my CV

>>>>

>>

>>>Oh, please, Graham, don't set up a good lawsuit for failure by
 using a

>>>celebrity-seeking ex-Scientologist, particularly one that
 breaks the law

>>>and flees to Canada to evade responsibility._ Use Gerry from
 the past

>>>experience he has had in Scientology; don't let him use your
 litigation as

>>>a conduit to bring media attention to feed his own
 self-inflated ego.

>>>

>>>Your Client & Armstrong-Alleged Scientology Squirrel,

>>>

>>>Garry Scarff

>>>

>>>

>>>

>>Garry:

>>

>>I have found it advisable to not give legal advice to lawyers,
 and the

>>very few times I did violate that convention I still knew that
 it was

>>foolish. Knowing its certain foolishness, I did so only because
 it was

>>really important to really important issues._ So, putting the
 facts

>>aside, I will assume the subject of my offered assistance to
 Graham

>>Berry is for you really important to really important issues. I

>>understand that you ANAL.

>>

>>Your advice to Graham that using me as an expert in my areas of
 >>expertise would "set up [his] good lawsuit for failure" is
 false,

>>defamatory and tortious interference with a potential business

>>relationship. You have no facts whatsoever on which to base
such an
>>assertion.

>

>Gerry, you are as transparent as a well washed
>window.

Thank you.

>Unless you were lucky enough to get a really degraded
>jury or judge I'm sure your game would be seen quickly by all.

>

I know you have something degraded in mind in this image of judge
and jury; but I have found that getting Scientology in front of
any jury is the battle, and for the cult the end of the war.

When you say "your game would be quickly seen by all" what do you
mean? And why are you, as you say, sure?

>>

>>You did this even after I listed 15 lawsuits in which my expert
>>testimony was part of a successful outcome against Scientology.
>>Therefore you manifest malice. But, IABAPPANAPP.

>

>You know what I think, Gerry?

>I think that your primary background is that of an an
anti-Scientology legal-

>whore working for shyster lawyers and that's all that gives your
miserable

>life any meaning.

No, I have no primary background.

No, I don't work for shyster lawyers.

No. I have never participated in legal whoredom.

No, my life is not miserable.

And my Creator gave my life meaning.

>That is why you further prove yourself an idiot by
>threatening Scarff's right to free speech on this newsgroup.

No, whatever I wrote did not prove me an idiot.

No, I didn't threaten Scarff's right to free speech in any way.
One of the balances to free speech, when speech enters the field
of personal attacks, is the recourse provided by libel law.
Garry's speech was a personal attack containing and based on
falsehood and intending to cause damage. Unlike your cult, I do
not threaten anyone's right to free speech in any way.

Since you've broached the subject, why don't you urge your cult
to stop suppressing free speech? It is only your cult on this
newsgroup which threatens free speech and uses the courts to
suppress free speech.

Another of the balances to speech used as Garry uses it, for personal attacks based on falsehood, is free speech itself. Garry attacked, Garry lied, and I exercised my right to speak freely to respond. Your cult maintains that it can say whatever it wants about me, no matter how false and no matter how hurtful, and that I cannot respond, or be jailed and fined if I do respond. Why don't you speak out against that insult to sanity?

> He threatened

>the very core of what you are and you reacted. He in essence said that

>you are a very bad legal-whore and you took offense. (believing yourself to be

>very good legal-whore)

No, Garry didn't threaten the core of what I am.

No, I didn't react, as you understand react.

No, I didn't respond because of Garry's threats.

I am grateful for your interpretation of his statements, because that is something essential to maintaining a defamation cause of action.

>>

>>Having the facts again brought to your attention, and having your

>>libel protested and refuted, will you please, as a first action to

>>mitigate the damage done, post to this newsgroup a full correction of

>>the falsehoods contained in your above statement.

>

>"mitigate the damage done"? IMHO you are of such questionable

>character it would be impossible to further damage you.

This is a good example to elucidate the distinction I was trying to make above. I am not threatening your right to free speech. In fact I and many people here welcome the day when Scientologists can and do speak freely. Your statement "you are of such questionable

character it would be impossible to further damage you," being false and intending indeed to further damage me, is libelous.

>

>>

>>I would think that your handlers

>> would realize that my public offering

>>of my expert assistance to Graham Berry eliminates the threat of a

>>cult lawsuit against him for inducing me to breach its "settlement

>>agreement." Since their agent responded to my public offer, their

>>agent's handlers have notice.

>

>How about the handlers of the handler's agents?

>
How about them?
>>
>>Gerry Armstrong
>
.
>Amigo
>
Gerry

Posted and E-mailed

Scientology has been disseminating one of my writings, which has come to be known as the "Pig Dream," and I thought I should mitigate my damages by letting the world know what it is, and its long and amazing history.

It doesn't hold a candle to Grady Ward's coprophilic opera, but draws from the same set of short scatologisms, which probably come from Old Norse, and Scientology uses it to attack me in the same way it uses Grady's literature to attack him. It is an honor to share both Scientology's attacks and the English language with the man.

On March 9, 1985, while staying at the Wilsonville, Oregon home of Garry McMurry, attorney for Julie Christofferson, and while waiting to testify in her trial, I had a dream. I have had few dreams in my life which were memorable and that I remembered the next morning. I have had fewer still that I wrote down; and I have had only one really raunchy dream that was memorable, that I remembered, and that I wrote down.

Because of the Scientology war, March, 1985 was a stressful enough time for me to excuse my dreaming any sort of dream. But the pig dream doesn't really relate to anything then going on, and, being a dream, it doesn't need excusing. Only years later did I come to understand, aside from its immediate and very obvious message, what it meant in my life.

What follows is a version with the expletives excised, because that's the only version I have with me, and because it's enough for Scientology's prurient purposes. ARS wordsmiths are invited to fill in the blanks.

[Quote]

3-10-85

Last night as I dreamed I received a warning to not [blank] the [blank blank]. If I did I would myself turn into a [blank].

Sometime later, sure enough, there appeared a [blank blank blank blank] and [blank]. She turned her [blank blank blank] almost in [blank blank], and turned her head back, looking at me [blank blank blank blank]. Her [blank] was [blank blank]. Her ears [blank blank]. Her mouth didn't move but she asked in perfect English if I'd like [blank blank blank]. There were [blank] of [blank] around her [blank].

I wanted to [blank blank] but I said no. She disappeared. I woke up.

I have thought of her several times today. She was there. I'm still here. [Blank blank blank blank blank]

(c) G. Armstrong

[End Quote]

For some then inexplicable reason I sent a copy of the unexcised recitation of the dream to my friend Dan Sherman, who had been, unbeknownst to me, operated by Scientology since 1982 to become my friend and ultimately to set me up in a cult intel op. I say "then inexplicable" because future events have made clear why I was moved to send the writing to Sherman.

During my cross-examination in the Christofferson trial in the spring of 1985 cult lawyer Earle Cooley revealed that Sherman had been working for Scientology, that I had been set up, that they had four hours of illegally taken videotapes of me during parts of which I swear like a logger, and that they had a number of writings they'd tricked from me, plus the dream. My recollection is that Multnomah County Judge Londer didn't allow the cult to admit it into evidence.

On July 3, 1986 cult lawyer Donald Randolph of the LA lawfirm Overland, Berke, Wesley, Gits, Randolph and Levanas signed and filed in Armstrong I (LASC No, 420153) the cult's "Objection of Cross-Defendant Church of Scientology of California to Release of Pre-Clear Files," supported by, among other exhibits, the pig dream. It is possible that Randolph later had a falling out with the cult; and there might be a reference to that in the 1992 American Lawyer article, which unfortunately I don't have here. What the cult had Randolph do in my case to prevent me from obtaining my pc folders was really low, and for a lawyer with any conscience left that could have been enough for a falling out. More about this in a future post.

In the 7/3/86 objection to release of my files, Randolph wrote:

"The above admissions (statements Randolph claimed were extracted from my pc folders), if the Church is ever forced to use them, must be construed as admissions against Armstrong's interest. They paint an incredibly sad picture of a pathetic and troubled individual who engaged in one illegal or deviant act after another until entering the Church; who continued, although in a comparatively minor way, to practice his debased activities while a member of the Church; and who immediately resumed his extremely aberrated activities upon leaving the Church as demonstrated by his theft of thousands of pages of personal materials and his "talking pig" essay, a sickening "personal creative work" authored by Armstrong for potential publication."

On November 18, 1986 I executed a declaration in Armstrong I which stated:

"The organization has demonstrated continually throughout the litigation of this case that truth, which must have some relationship to legitimate discovery, is, as far as the organization is concerned,

irrelevant. Attached hereto [] is a copy of a recitation of a dream I had in March 1985. I have blacked out for this purpose, anything which could be considered offensive. Donald Randolph has, in furtherance of the organization's goals, defined the recitation of the dream a "sickening work" demonstrating my "extremely aberrated activities." The dream was a dream. The recitation was true, and as artistically tight as I was capable of. To the organization, if it suits its purposes, however, dreams are reality, and truth is whatever can be twisted therefrom. The only thing "sickening" about the dream is how the organization acquired it and went about its degradation. I sent it to my friend Dan Sherman, a professional writer who had throughout 1984 encouraged me to write and who had "critiqued" some of my work. Sherman was, of course, being operated by the organization in the "Armstrong Operation" (the same operation which John Peterson says never happened), and Sherman either gave the organization the "dream" he had dutifully tricked me into sending him, or the organization simply stole it from him. Attached hereto [] is a letter from Sherman from March 1986 in which he indicates that the organization was indeed getting his mail. Since writing me, however, Sherman has apparently again been pressured by the organization because he has again cut communication with me and gone into hiding." (parens in orig).

The "settlement" of my litigation occurred in December, 1986, and the case file, which contained the pig dream, was, on Scientology's insistence, sealed.

When I again became involved in the Scientology war, I filed in the appeal the cult had taken from the 1984 Breckenridge decision a declaration I executed March 15, 1990 in which I wrote about Scientology's next use of the pig dream.

"On December 21, 1988 I received a call from Michael Flynn who relayed a message from Michael Lee Hertzberg, one of the organization's leading attorneys. Paul Morantz, Bent Corydon's attorney in one or another case, filed a motion to unseal the Armstrong court file. Judge Geernaert, who had inherited the Armstrong file after Judge Breckenridge retired, allowed the unsealing. The organization had 30 days to appeal. They wanted me to file a pleading to keep the court file sealed. They said that otherwise the "pig document" would come out. (This document, which was specifically sealed by Judge Breckenridge, was a recitation of a dream I had in 1985.) They also stated that if I didn't file something it would unsettle the settlement. They said they have a case on point. They said it would be bad for me. I could have to give the (settlement) money back. Mr. Flynn translated for me:

"It's a veiled threat." I said my decision at that time was to do nothing." (Parens in orig)

"On December 27, 1988 I again spoke by telephone with Mr. Flynn who had himself spoken to lawyers on both sides of Mr. Corydon's litigation. This is what I considered relevant at the time. Following Judge Geernaert's unsealing of the Armstrong- court file, the organization filed a petition for a writ of supersedeas claiming the sealing of the file was consideration for settlement. In his response Paul Morantz filed some settlement documents, a notary seal from the State of Pennsylvania on which identified Bill Franks, like me a former organization executive and witness in various organization-related cases, as their source. Mr. Franks had sent the documents to a lawyer to look at and the lawyer gave them to another lawyer who gave them to Mr. Morantz. The organization reacted. They claimed to have "the smoking gun," the proof of settlement violations. They charged that there were numerous breaches: they knew last summer that Mr. Franks had spent time with the Aznarans (who I understood to be organization executives who had recently defected and had sued the organization); and they had some instance of Homer Schomer doing something three weeks before. Mr. Flynn advised me he was going to file a pleading to say the settlement documents should remain sealed. I said I felt the court file should be unsealed and almost certainly would be at some point, but that I wouldn't do anything at that time." (Parens in orig)

When I was in Johannesburg, South Africa in August, 1991 at the request of Malcolm Nothling to testify in his case against Scientology, one of the cult's local attorneys smirked to Malcolm's attorney that he had the "pig dream."

Various cult black PR packs on me obtained in discovery in my Marin County litigation contain a statement parroting this one:

"Armstrong's state of mind is illustrated by various "literary" writings authored by him, none of which more clearly demonstrated it than a document now known as the "pig letter," in which Armstrong purported to describe a dream. [Attachment]"

One of the cult's black PR attacks on Factnet contained this statement:

"Gerry Armstrong, according to their Articles of Incorporation, is the President of FACTNET.

In December 1981 Armstrong, who worked as a librarian for the Church of Scientology, stole more than 10,000 pages of records belonging to L. Ron Hubbard and the Church. Armstrong loaned and showed the documents to others who were bent on attacking the Church to support their attacks.

Armstrong's state of mind is clearly illustrated by various "literary" writings authored by him, none of which more clearly demonstrated it than a document now known as the "pig letter," in which Armstrong described in graphic detail a dream he had where a pig asked him to have sex and he declined despite the fact he wanted to. Armstrong was formerly a heavy drug user, and on at least one occasion he was paid to provide homosexual sex."

At the 1993 Nonscam CAN Convention in Minneapolis, a cult heavy (I think named something like Bratchi, and a sometimes sidekick of Gene Ingram) hassled me about the dream.

Last month OSA mean guy Lynn Farny sent the dream and a bunch of other black PR on me to Channel 4 in the UK to try to stop the Hubbard documentary. In Edmonton, Alberta, Yvette Shank, OSA mean woman, sent the dream and another set of black PR to CHED Radio. I suppose the cult will soon be sending it to Congress, if they haven't already.

But they know that my writing about my dream is, as their attorney Donald Randolph stated under oath, my "personal creative work authored for potential publication." And they should know the copyright law well enough to know that by their dissemination of my unpublished work they are just being lowdown sneaky little garden variety copyright terrorists.

Gerry

On Fri, 14 Nov 1997 18:33:48 GMT,
rayr@delete.these.fields.ezlink.com (Ray Randolph) wrote:

>On Fri, 14 Nov 1997 17:10:11 GMT, grady@promisecreepers.org
(Grady

>Ward) wrote:

>

>>I think this corroborates the "Operation Funny Bone" op against
Jim Berry.

>>One wonders how many artists and writers have been "shuddered
into

>>silence" without any memorial at all?

>

>

>As a reminder, Here are the "Operation Funnybone" documents.

>Note: These, along with the original cartoon that started it
all, can

>be found at <http://www.ezlink.com/~rayr/doc/>

>

Note the date of these GO docs. Hubbard was at La Quinta,
California and communicating directly to GO Intel. See, e.g.,
5/20/77 despatch/order from Dick Wiegand. Hubbard personally had
Wiegand pick me up from the Culver City apartments, code name
Astra, in June, 1976, and lock me up in the intel bureau at the
Fifield Manor, now Celebrity Center.

Hubbard had Operation Funnybone and his correspondence with the
GO about Berry in his personal files which I had inside.

Hubbard began to communicate directly and regularly into the
lower echelons of the GO when he came ashore in Florida and
starting setting up the Clearwater operation in 1975. In Dunedin
he had a number of face to face meetings with local GO personnel
involved in the Clearwater scene.

After fleeing Dunedin in the spring of 1976 he stayed in
Washington, D.C., where he again picked up direct GO contact,
until he arrived at Astra in June. At his direction the GO
arranged the rental of the Astra apartments and purchase of the
La Quinta properties.

In July, 1977 the FBI raided GO intel in LA and DC. Hubbard fled
from La Quinta and went into hiding in Sparks, Nevada, and
thereafter couldn't operate the GO as closely and personally as
he had before the raid. When it appeared the Justice Department
might charge Hubbard the GO closed ranks and defended him,
claiming that he was not involved with their operations.

This "heroic" defense of Hubbard was then used by Miscavige in
his take over and subsequent scapegoating of the GO, using their
own shore story that they were an autonomous unit acting in
violation of Hubbard's policies and orders.

Gerry

46.

On Thu, 27 Nov 1997 21:18:17 GMT, ralph@atnet.at (Ralph Hilton) wrote:

>On Thu, 27 Nov 1997 11:17:53 -0800, Paul
<pauldb@REMOVE_ME.seanet.com> wrote:

>

>>Tilman Hausherr wrote:

>>> <pauldb@REMOVE_ME.seanet.com> wrote:

>>>

>>> >I don't like dead-agenting when it's practiced by the Church
of

>>> >Scientology[tm]. I like it even less when it's practiced
here.

>>>

>>> I love it. Lets judge Abelson by scientology standards.

>>

>>Your choice, of course, but I think I'd rather live by higher
>>standards. By my standards, dead-agenting is disgusting, no
matter who

>>practices it. YMMV.

>>

>

>Yes it does. I disagree entirely. Dead Agenting, as originally
defined by LRH is

>a very workable technique.

>

>The original definition of DAing is that one points out and
documents as

>necessary the lies presented by one's opposition. They are then
dead agents as

>no one believes them.

>

>The idiots in OSA cannot read. They misinterpret this to mean
"Invent some lies

>about one's opponents and spread them around".

>

>Thus they lay themselves bare to DAing as Hubbard defined it.

>

>I posted a very thorough Dead Agenting of Steve Fishman last
year exactly per

>the policy.

>

>He was posting lies and I demonstrated that. He hasn't been
treated seriously

>since.

>

>In the year and a half I have been on a.r.s I have not seen an
actual properly

>done DA by a Scientologist.

>

>This is probably associated with the observation that I haven't
seen many

>critics of the CofS post lies.

>

>When I see them do so then it is usually, from my observation,
not from
>malicious intent but misinformation.

>

>Dead Agenting is an ethical and workable procedure.

>

>

What Scientology's rulers call "dead-agenting" is actually what Hubbard called, and is, "black propaganda."

As Ralph says, the documenting of falsehoods is workable, and is the actual practice of actually practicing ars personnel.

Black PR is the actual practice of actually practicing scienoagents. Black PR is the use of falsehood and perversion of the truth for the purpose of destroying a targeted "enemy's" reputation and credibility.

It is black PR that everyone finds so disgusting. It is also disgusting that the cult calls its black PRing of its "enemies" dead agenting.

So please, in this forum, document and expose every lie Hubbard, the scientololgists and their agents tell, because that is one of ars's highest purposes. But stay away from black PR, other than to dead agent it.

Identify scientology's practice with the noun and verb "black PR." Don't fall for the cult's redefinition and misdefinition of words.

Black PR always returns to its source, and unless the scientologists completely repudiate this dark and nasty art, they will never escape it. Their reputation and credibility will be destroyed by their own black PR, and their own character destroyed by their own character assassination.

Gerry

>--

>

>Ralph

On Fri, 28 Nov 1997 21:34:44 GMT, wger@loop.com (wger) wrote:

>Joe Harrington <joe@worldnet.att.net> wrote:

>

>>RonsAmigo wrote:

>>>

>>> You are indeed an idiot if you believe DM reads

>>> ARS. I never cease to be amazed at the overblown

>>> sense of self-importance which is almost a trademark

>>> of the ARS bigots-R-us set.

>>>

>>>

>>> Amigo

>

>Joe,

>

>How about posting the details of the secret payments made to
Lerma,

>Wollersheim, Young, Ward, Erlich's lawfirm, Dandar etc. Why do
you

>suppose this is being hidden from ars?

>

>wger

You and your cult risk every one of those payments, secret or not, used utterly wisely or not, but going to any one of the people on your list supra, being recognized as an act of consummate courage, and you and your organization by seeking to make that courage something ugly, being recognized as consummate cowards. Your move.

Gerry

From rkeller@netaxs.com Tue Dec 09 06:42:14 1997
Newsgroups: alt.religion.scientology
Subject: SP Times Editorial on Lisa - Seminole edition
From: rkeller@netaxs.com (Rod Keller)
Date: 9 Dec 1997 14:42:14 GMT

A Times Editorial
Clearwater chief has earned his city's support
St. Petersburg Times
December 9, 1997

The Church of Scientology attack on Clearwater Police Chief Sid Klein has left city residents with a clear choice. They can either accept the irresponsible claims of Scientology officials or believe a man who has served his city fairly and effectively for 17 years.

Clearwater residents should voice strong support for Chief Klein.

And City Manager Michael Roberto, Klein's boss, should be commended for leaving no doubt that he backs his chief of police. "I was very disappointed in the church's response," Roberto said.

His disappointment is understandable.

The actions by Scientology officials last week dragged the city back to a time when the church used confrontation and reckless allegation to silence those who disagreed with it. Whatever accommodation Scientologists had gained in the community, it has been damaged by their latest behavior.

The string of events last week also raises troubling questions about Scientology's motives.

About 30 anti-Scientology demonstrators planned to march in front of the former Fort Harrison Hotel on Friday and Saturday to mark the second anniversary of Lisa McPherson's death. McPherson was a Scientologist who died after 17 days of isolation in the Fort Harrison building.

Scientology leaders tried to pressure the city into closing the sidewalk in front of their building to the demonstrators, warning that a church meeting and the opening of Winter Wonderland would expose thousands of visitors to potential violence. City officials refused to close the sidewalk but agreed to separate demonstrators from Scientologists with barricades. All Americans have the right to public protest as long as they don't violate the rights of others.

When the protest began Friday, the Fort Harrison building was dark and Winter Wonderland unopened. Instead of the promised activities, Scientologists were organizing their own demonstration. More than 3,000 church members marched with candles and signs around the police building and Clearwater Times office.

Scientologists have the right to march, as well, even when they chant hateful messages such as "Sid Klein, what's your crime?" But why were they so secretive about their plans? It is now clear that Scientology officials were disingenuous when they argued against the rights of 30 demonstrators at the same time they were planning a protest 100-times larger. Who could blame city officials if they now question those officials' sincerity?

Most damaging to the relationship between city and church was a 9-page letter sent Friday to Klein by Scientology official Brian Anderson. In the vitriolic letter, Anderson made several vague accusations about Klein and his department, including the charge that police give Scientologists too many parking tickets. Anderson refers to the diminutive Klein as "Big Sid" and accuses the police chief of "bigotry."

It appears to be more than coincidence that Anderson launched his attack only days before Klein's department will turn over its criminal investigation into McPherson's death to the state attorney.

Klein had a duty to investigate the death of a woman who had been kept isolated inside the Scientology spiritual headquarters for 17 days and then delivered to a Pasco County emergency room where she was pronounced dead.

Klein cannot let powerful Scientology officials or anyone else come between him and his responsibility to uphold the law.

Anderson's personal attacks on Klein contained scant detail and no proof. There is plenty of proof that Anderson's "bigotry" label is not true.

Klein's tenure as Clearwater police chief has been marked by fairness and balance. He has weeded out bad cops. In minority neighborhoods, Klein has listened to complaints against his department and acted to resolve problems. Klein personally led the politically unpopular effort to build a homeless shelter downtown.

Soon after he took the job in January 1981 Klein said, "I told my officers they will treat Scientologists like anybody else." The Church of Scientology has not offered any credible evidence that Klein has broken his word.

--

Rod Keller / rkeller@voicenet.com / Irresponsible Publisher
Black Hat #1 / Expert of the Toilet / Golden Gate Bridge Club
The Lerma Apologist / Merchant of Chaos / Kha Khan countdown: 9 to go
Killer Rod / OSA Patsy / Quasi-Scieno / Mental Bully

From The.Galactic.Federation@ThePentagon.com Wed Dec 10 00:05:44 1997
Newsgroups: alt.religion.scientology
Subject: Re: Someone keyed my car... hmm, wonder who?
From: The.Galactic.Federation@ThePentagon.com (Anti-Cult)
Date: Wed, 10 Dec 1997 09:05:44 +0100

On Tue, 09 Dec 1997 19:39:30 GMT.
teddy@skylink.net (Ted Mayett (KoX)).
From: Zippo News Service [http://www.zippo.com].
Wrote on the subject: Re: Someone keyed my car... hmm, wonder who?:

>On Tue, 09 Dec 1997 12:29:01 GMT, mdallara@kcii.com (Mark Dallara)
>wrote:

>
>>[posted to a.r.s]
>>

>>Jeff Jacobsen and I were driving back out to Ybor City for some dinner last
>>night, and to see if the Dianetics Center was open, and I stopped to get
>>gas. That's when I noticed that my car had been keyed, on both sides, and
>>near the gas tank inlet someone had inscribed "fuck you".

>>
>
>Yep, we are down to the criminals.
>Only criminals are left in the cult. (newbies excluded)
>
>>

Or they might have started the next phase on their way to destruction:
Hiring criminals and thugs to do their dirty job. Yes, I think that's
the case. Nobody in this NG, should live with the illusion that
scientology will die silent, no on the contrary they will do whatever
they can to stop their own death.

That means that they would even hire contract killers to kill critics if
the must. After all, they do believe that they are under attack from an
alien intergalactic fleet. Do not ever forget that. The organization
that we oppose here, is totally insane. Their leaders would all qualify
for the Hitler of the year award if there was any. The first winner
would of course be Hubbard himself. When this criminal organization in
the end comes crashing down, I think that the leaders would fit much
better in a mental institution than in a jail.

"Somebody some day will say 'this is illegal'. By then be sure
the orgs say what is legal or not."

-- L. Ron Hubbard, HCOPL 4 January 1966

***** Body thetans? We don't need no stinking Body Thetans! *****
***** http://www.users.wineasy.se/noname/index.htm *****
*** Public PGP key: http://www.users.wineasy.se/noname/pgp.htm ***
***** The.Galactic.Federation@ThePentagon.com (Anti-Cult) *****

Victimized by the Co\$. "Deadfiled" in at least one Org. Seen too
much, heard too much, lived too much. Security Coded hard disks
too much. Have been reading NOTS too much. Having chronic

pneumonia. As Arnold said: I'll be back.....

From cobalt@tigerden.com Wed Dec 10 11:06:08 1997
Newsgroups: alt.religion.scientology
Subject: Re: Hidden Knowledge, Church, Copyright and Lisa.
From: cobalt@tigerden.com (Chris Sutor)
Date: 10 Dec 1997 19:06:08 GMT

Keith (kewyatt@nospaam.teleport.com) spake thusly:

: Well let's talk about two religions that have a similar
practice. This would
: be the Jewish and Christian Religions. In the book of Daniel
things are
: revealed, but they are hidden. Also in the book of Revelation
what exactly
: is man's number mean and what is the seventh seal?

I'd hardly call these similar. I think the price tag that goes
along with
being allowed to read scientology's "scriptures" sways any
attempt at
comparison.

: The authors intentionally
: hide something from the reader and all followers of the
religion.

...however they DON'T say that anyone who reads that bit before
this bit
will go completely insane, and then punish them for it. The
problem isn't
one just of what's written, but all the rules and regulations
that deal
with who gets to read what, for what price and when. A beginning
parishoner in Christianity or the Jewish faith are allowed to read
the
entirety of the scriptures from beginning to end, whenever they
wish, with
no information kept from them only to be awarded after they've
paid their
"fixed donations" - nobody goes telling them. "You can only read
Mathew,
Mark and Luke. You haven't worked your way up to John yet, and if
you read
it you'll go mad."

: Believe
: it or not in the Catholic Church there is much hidden study
into the
: prophecies of the bible. The documents related to these are
secret and only
: a few can read them.

Because these books stem from a time before printing houses -
they were

created by hand, are extremely ancient, and quite amazingly fragile. Many of these volumes are kept in vaccum-sealed cases, to protect them from the impurities of the air. If these books were not kept in such a manner they would soon dissolve into shapeless, unreadable masses of crackley dust. There hardly seems cmparison between these books, and the mass-produced packets and books of scientology.

: Do you know that the Vatican is using astronomy
: observatories to look for signs in the heavens based on these secrets?

So?

: Scientology's hidden knowledge regarding the upper levels are no different
: then any judeao/Christian Religions.

I think my above statements demonstrate this assumption to be ill-conceived.

: The only thing unique about
: Scientology's secrets is that they use man's law to an extreme to try and
: protect them.

Yes, spreading the gospel is only important if the bottom line is kept a strict eye upon. No enlightenment without fresh ink on the checks. Anyone attempting to spread the word without bringing in money, or posting the scriptures to a public forum is an enemy of the worst kind.

The scientology scriptures could be Charlie brown cartoon books for all the scientology bigwigs care - the words aren't nearly as imprtant as the money the bring in.

: However, I will let you know that the Catholic Church uses
: copyright laws to protect their articles and writings.
Recently, there was a
: letter published by the Catholic Church about Homosexuality and the parents.
: Well some people decided to publish it on their web page and the Church used
: copyright law to pull it down. So Scientology is not alone in using the law
: to protect it's works.

silly
not to see the connection. Imprisonment! same thing - yes, it all
ties up
into a neat little ball, doesn't it?

: Jesus of Nazareth talked about immoral
: or sinful behavior.

..and then he turned water into wine.

: One of the items was why do you worry about the other
: persons immoral acts when you have your own to worry about?

If scientology's critics were all carrying on the same kind of
disgusting
display that scientology itself was, there might be some weight
to your
words, however neither Larry Wollersheim, or Grady Ward have ever
tied
someone to a bed, and dehydrated them to death - they've never
locked
someone up "for their own good" in a tiny little cell, as part of
their
religious practices and I'm pretty sure they've never thrown some
tied up
with rope off their ocean liner.

: The critics talk
: about black PR and DA tactics, however they participate in the
same actions
: that they accuse the CoS of.

Nope - they don't. The critics only point out scientology's
errors, crimes
and mistakes - we don't have to make up the kind of lies that
scientology
prefers to use on it's critics. Scientology is it's own worst
enemy.

: They publish articles that portray Scientology
: in a bad light.

...Including stories from newspapers, off television programmes,
and
personal accounts of ex-scientologists - I say again that we
don't need in
invent bad things to say - scientology provides a whole mass of
new bad
press for itself week after week.

: They attack individual Scientologist with material to
: discredit them.

Name some. Describe the circumstances.

: I say let them have their beliefs and practice it. It comes down to
: respecting their rights.

If a religion were to start up whose principal belief is that everyone named Bob must die by thursday, should we respect their rights as well?
Scientology's own written scriptures provide proof of just what a corrupt system they are.

: Each individual will decide if Scientology is right
: for them. This is what freedom is about.

...and in order for them to form a complete and valid image of what scientology is, they should be allowed access to ALL information about the cult, good or bad - and including that organisations principal beliefs.
Unfortunately these beliefs are buried under layers of courses, so that by the time they've seen and learned them all, they've already paid out more money than most people see in a lifetime, often having to beg borrow and steal to get the next course. Only by making these materials and scriptures public domain can the cult's true nature be revealed - THAT is why scientology argues so heavily over it's copyrights. The scam only works if you don't already have the information.

: I forget which one of the American
: Founding Fathers said this but it was regarding the Freedom of Religion,
: What my neighbor believes does not harm me, it is what the state tries to
: make me believe or not believe that harms me.

...so of course the cult immediately tries to make it illegal to do anything the cult doesn't want done. scientology is attempting to force the state to force their beliefs upon people. hence the neverending lawsuits, and that ridiculous, inaccurate and ill-formed human rights report.

: On the death of Lisa McPherson I agree that what happened to her was wrong,

: but I have faith that this will not be repeated and that
justice will be
: delivered in the courts.

She's not the cult's first human rights abuse. She may not be the last.

Who was it that had the list of the cult's human rights abuses on their website? Perhaps another critic can post the URL.

: Lisa death no matter how tragic is not routine and
: is unique in the history of Scientology.

Bull. She's also not the first death.

No matter how much muckraking is
: printed in the newspaper or on the internet I'm confident that
this was an
: abnormal occurrence.
: Far more people were intentionally harmed by AUM than have been
harmed by
: Scientology. I'm confident that this was a mistake in judgement
by those
: around Lisa then by Scientology itself.

A mistake in judgement - it was a mistake when they decided to follow the introspection rundown's steps, rather than simply release her when she wanted to leave.

: Keith
: -----
: To the Jews who had believed him Jesus said,
: "If you hold to my teaching, you are really my disciples.
: Then you will know the truth, and the truth will set you
: free." They answered him, "We are Abraham's descendants
: and have never been slaves of anyone. How can you say that
: we shall be set free?" NIV John 8:31-33

--

COBALtAtTIGERDENDotCOM I'd really like a New World Order, but

----- I can only afford a slightly used
one.

now with 10% real

fruit juice! Don't blame me, I voted for Richard
Dangerous

From jjh@cagent.com Wed Dec 10 11:24:31 1997
Newsgroups: alt.religion.scientology
Subject: Re: Tilman and Trolls
From: jjh@cagent.com (Joel Hanes)
Date: 10 Dec 1997 19:24:31 GMT

mreuss@rmi.nospam.net (Michael Reuss) writes:

> ...
> And not long after that, he will come to see the cult's
controlling,
> deceitful, manipulating behaviors, he'll see them spilling out
of every
> crack and crevice of his totalitarian group. The double-think
and mental
> manipulations will be laid bare for him to see. At that point,
he will
> have ceased to be a Scientologist. Then who knows, maybe later
he'll
> come back to a.r.s and post a nice affidavit. He'll take his
rightful
> place alongside Gerry Armstrong, Robert Young, Dennis Erlich,
Arnie
> Lerma, Bob Penny, and Larry Wollersheim.
>
> Yeah, that's what I'd like to see...

This was always my hope for Andy Milne, who, I thought,
had a working mind shut up in there somewhere, if he'd
only let it out.

Andy, if you're out there: good luck.
I've often wondered what happened, where you went
after you ceased to post the \$cientology PR line here.

In fact, this is my Christmas wish to and for \$cientologists
everywhere: that the scales fall from their eyes, that they
wake up to the ways in which they are and have been
systematically
exploited, lied to, manipulated, and bilked of their money,
time and energy, and that they quietly blow the cult.

Joel Hanes SP4
University of Ediacara

Houseman Scholar

"I have a mind myself and recognize
Mind when I meet with it in any guise.
No one can know how glad I am to find
On any sheet the least display of mind."

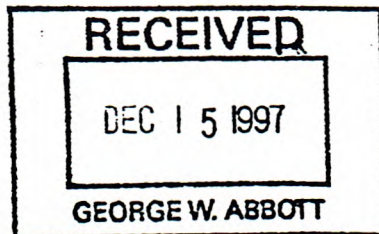
Robert Frost

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27

ANDREW H. WILSON

WILSON CAMPILONGO LLP
115 SANSOME STREET, SUITE 400
SAN FRANCISCO, CALIFORNIA 94104
(415) 391-3900
TELECOPY (415) 954-0938



December 12, 1997

Mr. George W. Abbott, Esq.
George W. Abbott, Chartered
P.O. Box 98
Minden, Nevada 89423

Re: Armstrong v. Church of Scientology of Texas, et al.
Our File No. SCIO2-003

Dear Mr. Abbott:

After a review of the complaint in the referenced matter, I write to offer you and your client the opportunity to voluntarily dismiss the action without fear of facing a motion for sanctions under Rule 11 of the Federal Rules of Civil Procedure.

By signing the complaint, you have certified that the allegations contained therein are true and correct to the best of your knowledge and belief after reasonable inquiry. Any reasonable inquiry would have disclosed, and I am confident we will prove without question, that Mr. Armstrong was not a resident of Nevada when the complaint was filed. Mr. Armstrong was, and still is, a fugitive from California where he last maintained his residence and has been residing since that time in Canada. Filing this action in Nevada is a transparent attempt to avail your client of the benefits of Nevada's statute of limitation for defamation. We believe that this motivation will be quite evident to any court considering the matter.

It is also apparent that you have failed to perform even the most rudimentary investigation into the background of your client and the litigation between him and my client. If you had, you would know that the statements at issue are neither defamatory nor unprivileged. I suggest that you very carefully review the allegations of your complaint, the history of the litigation between our respective clients and the elements of the tort of defamation. I am confident that such a review will lead you to the conclusion that the claims made in your complaint are unfounded and should be dismissed.

Mr. George W. Abbott, Esq.
December 12, 1997
Page 2

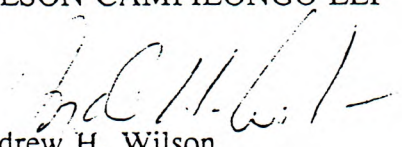
Perhaps the most egregious aspect of your complaint is that it revisits and attempts to recover for a "fifteen year[s]...course of conduct designed to destroy plaintiff Gerald Armstrong." I am flabbergasted that you could contend this in the face of the Settlement Agreement of December 1986, which expressly released all claims and which provided that the "slate was wiped clean." You should review the cross complaint filed by Mr. Armstrong in Church of Scientology International v. Gerald Armstrong, Marin County Superior Court Action No. 157680. That cross-complaint is based on facts virtually identical to those asserted in your complaint, and was disposed of on summary adjudication, thus barring future assertion of any claims arising out of the same set of facts under the principals of res judicata and collateral estoppel with which I assume you are familiar.

Further evidence of the lack of care taken in preparing and filing the complaint is found in your designation of Marin County Action No. 157680 as a "related case," something which even the most inexperienced attorney would realize is inappropriate. I recognize Mr. Armstrong's hand in the language of the complaint and can only conclude that you did not even review it before it was filed.

I hope you take this opportunity to fully analyze the facts and applicable law before continuing this ill-conceived and fatally flawed litigation.

Very truly yours,

WILSON CAMPILONGO LLP



Andrew H. Wilson

AHW-3052.LTR

22

GEORGE W. ABBOTT, CHARTERED
Law Offices

December 17, 1997

Andrew H. Wilson, Esquire
Wilson Campilongo, LLP
115 Sansome Street, Suite 400
San Francisco, CA 94014

Re: Armstrong v. Miscavige
USDC for the District of Nevada
No. CV-N-97-670-ECR (RAM)

Dear Mr. Wilson:

I write in response to three comments made by you in your letter of December 12.

1. You write that "Filing this action in Nevada is a transparent attempt to avail [my] client of the benefits of Nevada's statute of limitation for defamation."

Filing this action in Nevada has nothing to do with statutes of limitations. It has to do with Mr. Armstrong's residence. You will recall that in my February 12 and 14, 1997 letter, to which you responded on February 25, I offered your clients the opportunity to correct the defamatory statements in the 1993 black PR publication and the 1996 Cathy Norman letter. You will see in my letter the statement: "If an understanding cannot be reached, and correction of this situation cannot be achieved, Mr. Armstrong is prepared to file a lawsuit for, inter alia, defamation, intentional infliction of emotional distress..." Since your clients chose to attack me and Mr. Armstrong, rather than correct the situation, I filed the complaint on his behalf. It is clear that if anyone needed a "transparent attempt" to avail himself of the Nevada statutes, he would not have written a letter like mine of February 12 and 14.

Mr. Armstrong left California early this year because of threats from the Scientology organization and his need to have some measure of safety from those threats. Because his movements since leaving California have been brought about by their own unlawful actions, Scientology's principals and agents have no legal or moral basis for complaining about where Mr. Armstrong resides. He has been for some considerable time a resident of Nevada.

2. You write: "[The Armstrong IV] cross-complaint is based on facts virtually identical to those asserted in your complaint,

Andrew L. Wilson, Esq.
December 17, 1997
Page Two

and was disposed of on summary adjudication, thus barring future assertion of any claims arising out of the same set of facts under the principals (sic) of res judicata and collateral estoppel with which I assume you are familiar."

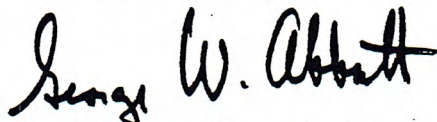
As you know, Mr. Armstrong received your clients' defamatory documents in late November, 1996, and these documents were disseminated by your clients only a little more than a month earlier. The cross-complaint was filed years earlier. The principles of res judicata and collateral estoppel are therefore inapplicable. If, however, you have facts to support your assertion that these principles do apply in this defamation case, I am interested in examining them.

3. You write that you offer me and my client "the opportunity to voluntarily dismiss the action without fear of facing a motion..."

I understand by this, and by the rest of your letter, that you have accepted service of the summons and complaint on behalf of the six named defendants: David Miscavige, RTC, CSI, Sea Org, Scientology Texas and Cathy Norman. Is this correct?

Assuming this understanding is correct, I am enclosing herewith a copy of the Minutes of the Court from December 2, 1997 ordering this action reassigned to the Honorable Edward C. Reed, Jr., and changing the case number to CV-N-97-670-ECR (RAM).

Sincerely,

A handwritten signature in black ink that reads "George W. Abbott". The signature is written in a cursive, slightly slanted style.

George W. Abbott

Enclosure

cc: Gerald Armstrong

RECEIVED

DEC 4 1997

GEORGE W. ABBOTT

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
RENO, NEVADA

FILED
DEC -2 11:00
LANCASHIRE
BY *GR*

GERALD ARMSTRONG,

Plaintiff,

VS.

DAVID MISCAVIGE, et.al.

Defendants.

CV-N-97-670-ECR(RAM)

Formerly CV-N-97-670-DWH(RAM)

MINUTES OF THE COURT

DATE: December 2, 1997

PRESENT: THE HONORABLE HOWARD D. MCKIBBEN, CHIEF U.S. DISTRICT JUDGE

Deputy Clerk: BRENDA L. GORBET Reporter: NONE APPEARING

Counsel for Plaintiff(s): NONE APPEARING

Counsel for Defendant(s): NONE APPEARING

MINUTE ORDER IN CHAMBERS XX

The Honorable David W. Hagen, U.S. District Judge having referred the above entitled case to the Chief Judge for further reassignment; the clerk having conducted a random draw pursuant to the instructions of this court, and good cause appearing therefor,

IT IS ORDERED that the above entitled action is hereby reassigned to the HONORABLE EDWARD C. REED, JR., U.S. DISTRICT JUDGE for all further proceedings. Hereafter, this action shall bear case number:

CV-97-670-ECR(RAM).

The Clerk is directed to change the docket sheet and the file to reflect the reassignment.

LANCASHIRE S. WILSON, CLERK

By: Brenda L. Gorbet

Supervisor

62

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3 (415) 954-0938 (fax)

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MOXON & BARTILSON
5 550 N. Brand Blvd., Suite 700
Glendale, CA 91203
6 (818) 546-5064
(818) 546-5068 (fax)

7 Attorneys for Plaintiff/Judgment Creditor
8 CHURCH OF SCIENTOLOGY INTERNATIONAL

9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF MARIN

12 CHURCH OF SCIENTOLOGY
13 INTERNATIONAL, a California not-for-profit
religious corporation,

14 Plaintiff,

15 vs.
16

17 GERALD ARMSTRONG, et al.,

18 Defendants.
19

) CASE NO. 157 680

) [CONSOLIDATED]

) EX PARTE APPLICATION FOR
) ORDER TO SHOW CAUSE WHY
) DEFENDANT GERALD
) ARMSTRONG SHOULD NOT BE
) HELD IN CONTEMPT;
) MEMORANDUM OF POINTS AND
) AUTHORITIES
) (CCP § 1212)

) Date:

) Time:

) Place:
)

21
22 Plaintiff/Judgment Creditor, Church of Scientology International ("CSI") applies *ex*
23 *parte* for an order directing Defendant/Judgment Debtor Gerald Armstrong ("Armstrong") to
24 show cause why he should not be held in contempt of this Court, pursuant to section 1209
25 (a)(5) of the California Code of Civil Procedure, for willful disregard of this Court's Order
26 entered on October 17, 1995, in the above-entitled action (the "Order").

27 This application is made on the grounds that Armstrong has committed at least thirteen
28 separate and distinct violations of the Order. Specifically, Armstrong: (i) prepared and posted

1 on the Internet five documentary works in violation of the Order; (ii) appeared on a television
2 program on Channel 4 in England entitled "The Secret Lives of L. Ron Hubbard" in which he
3 violated the Order and gratuitously made numerous false statements concerning the Church of
4 Scientology and the founder of the Scientology religion, L. Ron Hubbard; (iii) made three
5 television appearances in Germany on or about October 26-28, 1997 on television stations N-
6 TV, B1 TV, and SAT1 TV, making many of the same statements as well as others; (iv) made
7 a speech in Berlin, Germany in which he also violated the Order in several respects; (v) gave
8 an interview to the German regional newspaper *Taz* which violated the Order; (vi) made a
9 speech which contained statements violating the Order in Hamburg, Germany on October 28,
10 1997, at an event sponsored by self-styled critics of the Church of Scientology; and (vii)
11 prepared and posted on the Internet an alleged complaint for libel against CSI and other
12 Beneficiaries of the Order.

13 Armstrong has treated this Court's authority with such callous disregard that he should
14 be criminally sanctioned by fine and imprisonment under Code of Civil Procedure § 1218.
15 CSI submits that Armstrong's actions also warrant referral to the District Attorney for
16 misdemeanor prosecution under Penal Code § 166(4).

17 Armstrong has been notified of this Application as set forth in the Declaration of
18 Andrew H. Wilson, at ¶ 28.

19 This Application is based on this Application itself, the concurrently filed declaration of
20 Andrew H. Wilson; the exhibits submitted therewith; the records on file in this case; and such
21 further evidence and argument as may be properly presented at the hearing of this Application.

22 Dated: December 1, 1997

Respectfully submitted,

KENDRICK L. MOXON
MOXON & BARTILSON

WILSON CAMPILONGO, LLP

By: 

Andrew H. Wilson
Attorneys for Plaintiff/Judgment Creditor
CHURCH OF SCIENTOLOGY
INTERNATIONAL

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1 with a "Happy Thanksgiving" salutation to CSI and the other beneficiaries of his settlement
2 agreement.

3 Armstrong leaves himself only one fate. He must be held in contempt again, and he
4 must face that same result each time he commits a contumacious action and his contempt must
5 be enforced whenever he is within the jurisdiction. There is no other remedy for a
6 calculating, deliberate outlaw.

7 II. FACTUAL SUMMARY

8 This Court may recall the extent of Armstrong's behavior which gave rise to the
9 Injunction, and his past disregard for the authority of the courts of this State. To summarize,
10 in December 1986, Armstrong freely and voluntarily entered into a Mutual Release of All
11 Claims and Settlement Agreement (the "Agreement") pursuant to which CSI paid Armstrong
12 \$800,000.00. Declaration of Andrew H. Wilson ("Wilson Decl."), at ¶ 2. In exchange for
13 his receipt of such funds, Armstrong promised, in essence, to cease disseminating
14 "information" concerning CSI and to cease assisting others litigating or defending claims
15 against CSI and related entities. *Id.* Beginning in approximately 1990, Armstrong
16 fraudulently transferred substantially all of his assets to his attorney and close friends, and then
17 began repeatedly breaching almost every covenant he made in the Agreement. *Id.*, at ¶ 3.

18 As a result of Armstrong's conduct, CSI brought this action for breach of the
19 Agreement seeking, *inter alia*, a permanent injunction preventing Armstrong from further
20 breaching the Agreement. *Id.*, at ¶ 4. For his part, Armstrong filed various claims against
21 CSI for breach of the Agreement and other purported claims. *Id.*

22 On October 17, 1995, this Court granted an Order of Permanent Injunction against
23 Armstrong (hereinafter the "Order" or the "Injunction") following motions for the Summary
24 Adjudication of Issues brought by CSI. *Id.*, at ¶ 9. The Order was later incorporated into the
25 judgment entered against Armstrong on May 2, 1996 (the "Judgment"). The Injunction, *inter*
26 *alia*, prohibits Armstrong from voluntarily assisting persons litigating claims against CSI or
27 any named "beneficiaries." In addition, it also prohibits Armstrong from "Facilitating in any
28 manner the creation, publication, broadcast, writing, filming, audio recording, video

1 recording, electronic recording or reproduction of any kind of any book ... television program
2 ... or documentary work of any kind which discusses, refers to or mentions Scientology, the
3 Church, and/or any of the Beneficiaries [of the Settlement Agreement].”

4 Despite the Injunction, Armstrong's wrongful conduct continued as if nothing had
5 happened. Earlier this year, he wrote and filed a lengthy declaration (the “Declaration”) in
6 support of litigants adverse to a beneficiary of the Settlement Agreement in three cases
7 currently pending in the United States District Court for the Northern District of California.
8 Armstrong then sent copies of the Declaration to the parties and their counsel. On CSI's
9 application, an Order to Show Cause re Contempt was issued which was served by publication
10 because Armstrong had fled the jurisdiction. Armstrong was subsequently held in contempt,
11 and ordered punished by the imposition of a \$1,000 fine and confinement for a period of forty-
12 eight hours.

13 Even this did not deter Armstrong, who has violated the Injunction repeatedly.
14 Between September 2 and October 23, 1997, Armstrong created seven separate publications of
15 documentary works which discuss CSI and other named beneficiaries of the Settlement
16 Agreement and published them widely via the Internet. Wilson Decl., ¶¶ 15-21. In October,
17 he recorded an appearance on a British television show entitled *The Secret Lives of L. Ron*
18 *Hubbard*, which was broadcast on November 19, 1997, and on which he made statements
19 concerning Mr. Hubbard, the founder of the Scientology religion, in violation of the
20 Injunction. Armstrong engaged in a veritable orgy of violations in Germany between October
21 26 and 28, making two speeches in which he violated the Injunction repeatedly and gave
22 interviews in violation of the Injunction to at least three television stations and a regional
23 newspaper. Wilson Decl., ¶¶ 23-25. Finally, in an obvious but flawed attempt to avail
24 himself of the litigation privilege, Armstrong again violated the Injunction with an Internet
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1 posting on November 26, 1997, which purported to be a verbatim transcription of a complaint
2 which he had filed in the United States District Court for the District of Nevada.²

3 The recent violations of the Injunction in Great Britain and Germany have forced the
4 Church to expend a great deal of time and money to correct the multiplicity of falsehoods and
5 lies which Armstrong has promulgated. Armstrong's claimed expertise concerning the
6 Church, based on nothing more than having been the clerk entrusted with the care of certain of
7 Mr. Hubbard's personal files, gives him a superficial credibility, even though he has not been
8 involved in any facet of the Scientology religion since 1981. Evidence of this is the German
9 media's false reference to Armstrong as Mr. Hubbard's "biographer." The Church did not
10 pay Armstrong to silence him by the settlement, but to save itself the time and expense of
11 responding to and correcting every false allegation Armstrong made.

12 That is precisely why the Church feels it now must return to Court to enforce the
13 Injunction with the only means available to it. Given the blatant and recurring nature of his
14 violations, CSI cannot sit idly by while Armstrong thumbs his nose at this Court and the entire
15 judicial system in general. CSI asks this Court to hold Armstrong in contempt as that is the
16 only way in which he will be forced to realize that he must obey the Court's orders.

17 III. ARGUMENT

18 These facts provide abundant cause for this Court to issue an Order to Show Cause
19 why Armstrong should not be held in criminal contempt for his willful disobedience of this
20 Court's October 17, 1995 Order. Code of Civil Procedure § 1209, *et seq.*, provides this
21 Court with the power to punish acts, such as Armstrong's, which are in "disobedience of any
22 lawful . . . order of the court." Code Civ. Proc. § 1209(a)(5). *See also, Pacific Telephone*
23 *and Telegraph Co. v. Superior Court* (1968) 265 Cal.App.2d 370 (section 1209 contempt
24

25 ² A brief perusal of this complaint reveals that it is based upon the same alleged wrongs
26 done to Armstrong as was his cross-complaint in this action which this Court dismissed on
27 summary adjudication. It is also based, in part, on alleged wrongs done to Armstrong prior
28 to the Settlement Agreement sued on herein which the Settlement Agreement specifically
released. Moreover, the Settlement Agreement pointedly prohibited Armstrong from relying
on those wrongs in subsequent litigation.

14 The Order was valid when rendered and remains fully enforceable. A true and correct
15 copy of the Order is attached as Exhibit D to the Declaration of Andrew H. Wilson, filed
16 herewith.

17 **1. There has been no successful direct attack against the Injunction.**

18 Since its entry, there has been no successful challenge to the validity of the Order by
19 Armstrong. Wilson Decl., at ¶ 10. Armstrong has appealed from the Judgment and Order.
20 Briefing is not yet complete and CSI has moved to dismiss the appeal on the grounds that a
21 party may not simultaneously appeal from an injunctive order while willfully disobeying it.
22 That motion is still pending. *Id.* Significantly, the Preliminary Injunction which preceded the
23 Order was affirmed following Armstrong's petition to the Court of Appeals. *Id.*

24 **2. Any collateral attack against the Injunction by Armstrong would be**
25 **meritless.** The only permissible collateral attack against the Order would be based on a
26 wholly meritless claim by Armstrong that it is invalid *on its face*. *People v. Gonzalez* (1996)
27 12 Cal.4th 804, 823-4.

1 The Court's file reflects that, prior to the entry of the Order, Armstrong fully litigated,
2 and lost, the various claims he made against enforcing the Agreement through injunctive
3 relief. Considerable time and effort was expended by the parties and this Court in addressing
4 Armstrong's arguments.

5 **B. Armstrong Had Actual Knowledge Of The Injunction When He Violated It.**

6 There can be no question that Armstrong had actual knowledge of the Order.
7 Armstrong's counsel appeared at the hearing pertaining to the Order and received notice of
8 entry thereof. Wilson Decl., at ¶ 11. Armstrong further received a Notice of Entry of Order,
9 served on his counsel, with a copy of the Order attached. *Id.* The law does not require that a
10 party subject to an order be personally served with a copy of such order before he may be
11 held in contempt of it. *People v. Superior Court* (1965) 239 Cal.App.2d 99. In fact, service
12 on Armstrong's counsel raises a rebuttable presumption that Armstrong had actual knowledge
13 of it. *Id.* at 104.

14 Armstrong's actual knowledge of the Order is also shown by the fact that Armstrong
15 himself signed and filed a Notice of Appeal and, on August 25, 1997, while appearing in *pro*
16 *per*, signed and mailed for filing the APPELLANT'S OPENING BRIEF with respect thereto.
17 Wilson Decl., at ¶ 10. Armstrong cannot, and apparently does not, deny that he has actual
18 knowledge of the Order. To the contrary, he apparently delights in boasting of his refusal to
19 honor it. *See, e.g.*, Wilson Decl., at ¶ 8.

20 **C. Armstrong Was Fully Capable Of Complying With This Court's Injunction.**

21 The restrictions placed on Armstrong's behavior by the Order are very specific and
22 limited. The Order provides, in pertinent part, as follows:

23 Defendant Gerald Armstrong, his agents, employees, and persons acting in
24 concert or conspiracy with him are restrained and enjoined from doing directly
or indirectly any of the following:

25 * * *

26 3. Voluntarily assisting any person (not a governmental organization or
27 entity) arbitrating or litigating adversely to the Beneficiaries.

28 4. Facilitating in any manner the creation, publication, broadcast,
writing, . . . electronic recording or reproduction of any kind of . . .

1 documentary work of any kind which discusses, refers to or mentions
2 Scientology, the Church, and/or any of the Beneficiaries [of the Order].

3 5. Discussing with anyone, not a member of Armstrong's immediate family
4 or his attorney, Scientology, the Church, and/or any of the Beneficiaries.

5 Nothing in the Order requires that Armstrong engage in any affirmative action.

6 Instead, Armstrong is merely restrained from continuing to disclose his "information" and
7 opinions. The restrictions on Armstrong's behavior in the Order stem from an agreement
8 which Armstrong made freely and voluntarily and for which he was paid \$800,000.00. *Id.*, at
9 ¶ 2.

10 The above sum of money was paid to Armstrong by CSI to end once and for all the
11 relationship between Armstrong and CSI and to eliminate Armstrong's very deliberate
12 campaign of harassment against CSI and its affiliates. Again, the Court's file in this case
13 reflects that Armstrong's ability to cease such conduct was an issue fully litigated prior to the
14 entry of the Order. This Court rejected all of Armstrong's claims as to his inability to comply
15 with the Order.

16 **D. Armstrong Has Willfully Disobeyed The Injunction And Must Be Appropriately
17 Sanctioned.**

18 The requirement that there be a "willful disobedience" of a court order to support the
19 sanction of criminal contempt is undeniably met here. Armstrong's violation of the Injunction
20 is clear, and his intent to do so is manifest.

21 From the moment he was first enjoined from the violation of the Agreement by the
22 Hon. Ronald Sohigian in June 1992, Armstrong has made plain his disdain for the court's
23 power to affect his actions and his intent to violate orders of court. See *Wilson Decl.*, at ¶ 5.
24 In late 1994, Armstrong's disobedience of the preliminary injunction issued by Judge Sohigian
25 led to the issuance of an OSC re Contempt which was heard before the Hon. Diane Wayne,
26 who admonished Armstrong for his conduct, but discharged the contempt with only a warning.
27 *Id.*, at ¶ 3. Recently, Armstrong was held in contempt and punished by a fine of \$1,000 and
28 forty-eight hours confinement for transmitting his declaration to Judge Whyte.

1 Armstrong's willfulness is shown starkly in his own Internet posting of October 20,
2 1997, Wilson Decl., Ex. I, in which he states: "[British television producers] 3BM did not
3 induce me to breach any agreement or judgment. The fact is I am willing to communicate to
4 anyone about Scientology or Hubbard and my experiences therewith at any time . . . and
5 require no inducement. I was more than willing to be interviewed by 3BM . . ."

6 Armstrong apparently feels that he is immune from the actions of this Court and that he
7 can disregard its orders with impunity. While the issuance of an additional contempt citation
8 may not immediately deter Armstrong, failure to act will send exactly the wrong message to
9 him — that CSI and the Court have despaired of ever bringing Armstrong into compliance
10 with the Order and will not even attempt to do so. This Court should exercise all of its
11 available powers to stop Armstrong's mockery of its authority and his violation of CSI's
12 rights. Armstrong should be subject to a \$1,000 fine and incarcerated for not more than five
13 days pursuant to Code of Civil Procedure § 1218 for each of the thirteen separate contempts
14 set forth above. CSI should also be awarded the costs and attorneys' fees it has incurred in
15 bringing this Application. In fact, since Armstrong has publicly disavowed money as a
16 meaningful or valuable commodity, incarceration appears especially necessary to impress upon
17 him the gravity of his behavior.³

18 CSI also submits that upon a finding of contempt under Code of Civil Procedure §
19 1209, *et seq.*, referral to the District Attorney for misdemeanor prosecution under Penal Code
20 § 166(4) is also necessary to curtail Armstrong's continued defiance of this Court's authority.

21 IV. CONCLUSION

22 Enough is enough. In light of the foregoing, plaintiff Church of Scientology
23 International respectfully requests that the Court order that Armstrong show cause why he
24 should not be held in contempt of court and why the Church should not be awarded its costs,

25 ³ Armstrong, in fact, declared bankruptcy in the effort to avoid his obligations under
26 the Agreement. Armstrong successfully discharged the approximately \$300,000.00 awarded
27 by this Court in damages to CSI in his bankruptcy proceedings. Wilson Decl., at ¶ 4.
28 Armstrong, however, failed in his effort to have the Bankruptcy Court discharge him from
the contractual obligations upon which the Order is based. *Id.*

1 including attorneys' fees, in bringing this motion. Further, upon finding Armstrong in
2 contempt under Code of Civil Procedure § 1209, *et seq.*, referral to the District Attorney for
3 misdemeanor prosecution under Penal Code § 166(4) is also necessary to curtail Armstrong's
4 continued defiance of this Court's authority.

5 Dated: December 1, 1997

Respectfully submitted,

6 KENDRICK L. MOXON
7 MOXON & BARTILSON

8 WILSON CAMPILONGO, LLP

9 By: 

10 ANDREW H. WILSON

11 Attorneys for Plaintiff/Judgment Creditor
12 CHURCH OF SCIENTOLOGY
13 INTERNATIONAL

1 PROOF OF SERVICE

2 I declare that I am employed in the City and County of
3 San Francisco, California.

4 I am over the age of eighteen years and not a party to
5 the within entitled action. My business address is 115
6 Sansome Street, Suite 400, San Francisco, California.

7 On December 5, 1997, I caused the attached copy of:
8 ORDER TO SHOW CAUSE RE CONTEMPT; EX PARTE APPLICATION FOR
9 ORDER TO SHOW CAUSE WHY DEFENDANT GERALD ARMSTRONG SHOULD NOT
10 BE HELD IN CONTEMPT; MEMORANDUM OF POINTS AND AUTHORITIES;
11 DECLARATION OF ANDREW H. WILSON IN SUPPORT OF EX PARTE
12 APPLICATION FOR ORDER TO SHOW CAUSE RE CONTEMPT to be served
13 on the following in said cause, by placing for deposit with
14 the U.S. Mail on this day in the ordinary course of business,
15 true copies thereof enclosed in sealed envelopes. The
16 envelopes were addressed as follows:

17 Gerald Armstrong
18 C/O George W. Abbott, Esq.
19 2245-B Meridian Blvd.
20 P.O. Box 98
21 Minden, Nevada 89423-0098

22 I declare under the penalty of perjury under the
23 laws of the State of California that the foregoing is true and
24 correct. Executed at San Francisco, California on December 5,
25 1997.

26 JUNE WILLIAMS
27 JUNE WILLIAMS
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I am over the age of eighteen years and not a party to the within entitled action. My business address is 115 Sansome Street, Suite 400, San Francisco, California.

Gerald Armstrong
C/O George W. Abbott, Esq.
2245-B Meridian Blvd.
P.O. Box 98
Minden, Nevada 89423-0098

Jane Williams
JUNE WILLIAMS

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6 Glendale, CA 91203
(818) 546-5064
7 (818) 546-5068 (fax)

8 Attorneys for Plaintiff/Judgment Creditor
CHURCH OF SCIENTOLOGY INTERNATIONAL
9

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MARIN

11 CHURCH OF SCIENTOLOGY)	CASE NO. 157 680
12 INTERNATIONAL, a California not-for-profit)	
religious corporation,)	[CONSOLIDATED]
13)	
Plaintiff,)	DECLARATION OF ANDREW H.
14)	WILSON IN SUPPORT OF EX
vs.)	PARTE APPLICATION FOR
15)	ORDER TO SHOW CAUSE RE
GERALD ARMSTRONG, et al.,)	CONTEMPT
16)	
Defendants.)	Date:
17)	Time:
)	Dept:

18
19 I, ANDREW H. WILSON, declare as follows:

20 1. I am a partner of the law firm of Wilson Campilongo LLP and am an attorney
21 admitted to practice in the State of California. I am one of the attorneys responsible for the
22 representation of the Plaintiff/Judgment Creditor in this action. As such, I have personal
23 knowledge of the facts set forth below and, if called upon to testify on such matters, would
24 and could do so competently.

25 2. In December of 1986, Armstrong entered into a Mutual Release of All Claims
26 and Settlement Agreement (the "Agreement") pursuant to which CSI paid Armstrong
27 \$800,000.00. In exchange for his receipt of such funds, Armstrong promised, in essence, to
28

1 cease disseminating information" concerning CSI and to cease assisting others pressing claims
2 against CSI and related entities.

3 3. I am informed and believe that, beginning in approximately 1990, Armstrong
4 fraudulently transferred substantially all of his assets and began repeatedly breaching almost
5 every covenant he made in the Agreement.

6 4. As a result of Armstrong's conduct, CSI brought an action for breach of the
7 Agreement seeking, *inter alia*, a permanent injunction preventing Armstrong from further
8 breaching the Agreement. Armstrong filed various claims against CSI for breach of the
9 Agreement.

10 5. The Honorable Ronald Sohigian entered the Preliminary Injunction in late May,
11 1992. Less than a month later, I was questioning Mr. Armstrong at a deposition when he
12 testified of his intention to ignore the settlement agreement and Judge Sohigian's Order:

13 A. When, I mean, I have, I have absolutely no intention of
14 honoring that settlement agreement. I cannot. I cannot logically,
15 I cannot ethically. I cannot morally. I cannot psychically. I
cannot philosophically. I cannot spiritually. I cannot in any way.
And it is firmly my intention to not honor it.

16 Q. No matter what a court says?

17 A. No court could order it. They're going to have to kill me.

18 6. A true and correct copy of page 124 of the Deposition of Gerald Armstrong
19 taken Wednesday, June 24, 1992, in which Mr. Armstrong made this statement, is attached
20 hereto and incorporated herein by reference as Exhibit A.

21 7. Shortly thereafter, in a declaration of February 2, 1993, Armstrong stated, "I do
22 not believe such non-assistance, covenants or orders are legal or do anything but obstruct the
23 administration of justice and attempt to destroy men's souls." A true and correct copy of pages
24 1, 9-11 and 29 of said declaration is attached hereto and incorporated herein by reference as
25 Exhibit B.

26 8. On August 15, 1993, Mr. Armstrong wrote to me, declaring that his breaches
27 of the settlement agreement and of Judge Sohigian's Preliminary Injunction continued
28 unabated, even in Armstrong's sleep. A true and correct copy of the letter which I received

1 from Mr. Armstrong, dated August 15, 1993, is attached hereto and incorporated herein by
2 reference as Exhibit C.

3 9. On October 17, 1995, this Court granted an Order of Permanent Injunction
4 against Armstrong (the "Order") following certain motions for the Summary Adjudication of
5 Issues by CSI. Such Order was later incorporated into the judgment ("Judgment") entered
6 against Armstrong on May 2, 1996. Attached hereto as Exhibit D is a true and correct copy
7 of the Judgment, to which the Order is an exhibit. (The Order and the Judgment are
8 collectively referred to hereinafter as the "Injunction.")

9 10. Since its entry, there has been no successful challenge to validity of the Order
10 by Armstrong. Armstrong, appearing in *pro per*, filed a Notice of Appeal regarding the
11 Judgment and Order and, also appearing in *pro per*, filed Appellant's Opening Brief. Briefing
12 is not yet complete and CSI has moved to dismiss the appeal on the grounds that a party may
13 not simultaneously appeal from an injunctive order while willfully disobeying it. That motion
14 is still pending. The Preliminary Injunction which preceded the Order was affirmed following
15 Armstrong's petition to the Court of Appeals.

16 11. Armstrong's counsel appeared at the hearing pertaining to the Order and I am
17 informed and believe that he received notice of entry thereof. Armstrong further received
18 notice of entry of the Order.

19 12. In January 1997, I learned of actions by Mr. Armstrong which I believe are
20 clear violations of the Injunction. These actions were brought to the attention of this Court
21 which issued an OSC re Contempt on February 19, 1997 and an Order of Contempt on August
22 6, 1997.

23 13. While the preliminary injunction which preceded the Order was in effect,
24 Armstrong willfully disobeyed it on numerous occasions. This gave rise to an earlier Order
25 To Show Cause Re Contempt, which was heard in December 1994 by the Honorable Diane
26 Wayne. I represented CSI at that hearing. Armstrong admitted the violations and pled for
27 mercy from the court. Judge Wayne discharged the contempt but admonished Armstrong to
28 conduct himself appropriately in the future.

1 14. Armstrong successfully discharged the approximately \$300,000.00 awarded by
2 this Court in damages to CSI in his bankruptcy proceedings. Armstrong failed in his effort to
3 have the Bankruptcy Court discharge him from the contractual obligations upon which the
4 Order is based.

5 15. On or about September 2, 1997, in violation of the Order, Armstrong created
6 and caused to be widely disseminated by means of the Internet a documentary work which
7 discussed CSI and other beneficiaries of the Settlement Agreement. A true and correct copy
8 of said documentary work is attached hereto as Exhibit E.

9 16. On or about October 14, 1997, in violation of the Order, Armstrong created and
10 caused to be widely disseminated by means of the Internet a documentary work which
11 discussed CSI and other beneficiaries of the Settlement Agreement. A true and correct copy
12 of said documentary work is attached hereto as Exhibit F.

13 17. On or about October 14, 1997, in violation of the Order, Armstrong created and
14 caused to be widely disseminated by means of the Internet a documentary work which
15 discussed CSI and other beneficiaries of the Settlement Agreement. A true and correct copy
16 of said documentary work is attached hereto as Exhibit G.

17 18. Also on or about October 14, 1997, in violation of the Order, Armstrong
18 created and caused to be widely disseminated by means of the Internet a documentary work
19 which discussed CSI and other beneficiaries of the Settlement Agreement. A true and correct
20 copy of said documentary work is attached hereto as Exhibit H.

21 19. On or about October 20, 1997, in violation of the Order, Armstrong created and
22 caused to be widely disseminated by means of the Internet a documentary work which
23 discussed CSI and other beneficiaries of the Settlement Agreement. A true and correct copy
24 of said documentary work is attached hereto as Exhibit I.

25 20. Also on or about October 20, 1997, in violation of the Order, Armstrong
26 created and caused to be widely disseminated by means of the Internet a documentary work
27 which discussed CSI and other beneficiaries of the Settlement Agreement. A true and correct
28 copy of said documentary work is attached hereto as Exhibit J.

1 21. On or about October 23, 1997, Armstrong caused to be widely disseminated by
2 means of the Internet a letter which he had apparently written previously to the Hon. Alfonse
3 D'Amato concerning the efforts of CSI to combat religious discrimination in Germany. This
4 action constituted the publication and/or broadcast of a documentary work which discusses CSI
5 and other beneficiaries of the Order. A true and correct copy of said documentary work is
6 attached hereto as Exhibit K. In this "letter" Armstrong states that "...this court order is
7 illegal and that Scientology procured it by illegal means. It impermissibly denies me freedom
8 of speech, freedom of religion, freedom of association and due process." Exhibit K, p. 1.
9 The "letter" continues with Mr. Armstrong's litany of false and derogatory charges against
10 CSI and its affiliates with which this Court is all too familiar and with which this Court would
11 not have been further burdened if Mr. Armstrong had simply obeyed the Order.

12 22. Sometime in early October, in violation of the Order, Armstrong voluntarily and
13 willingly participated in a videotaped interview during which he discussed CSI and other
14 beneficiaries of the Order. Armstrong was informed prior to the interview that it was being
15 recorded for broadcast on British television. I have personally reviewed a transcript of the
16 broadcast which was broadcast over television Channel 4 in Britain on November 19, 1997.
17 Attached hereto as Exhibit L is an accurate transcript of said broadcast. A copy of the
18 videotape is in my possession and can be made available to the Court.

19 23. I am informed and believe that Armstrong flew to Berlin, Germany sometime in
20 October, where he gave a speech on or about October 26, 1997. In that speech, Armstrong
21 violated the Injunction numerous times by *inter alia*, making statements about L. Ron Hubbard
22 and complaining that the Church is misusing the U.S. legal system and blaming the Church,
23 the U.S. legal system and even his own attorney for the fact that a contempt citation and arrest
24 warrant has been issued against him. During that same visit, Armstrong gave an interview to
25 the Berliner *Zeitung*, resulting in an article in that publication, a true and correct copy of
26 which is attached hereto as Exhibit M and a translation of which is attached hereto as Exhibit
27 N. The gross and obvious nature of the violation of the Injunction committed by Armstrong in
28 giving that interview can be easily ascertained from a simple perusal of the article itself.

1 24. I am informed and believe that on October 28 Armstrong traveled to Hamburg,
2 Germany where he appeared at an event sponsored by self-styled "anti-cultists" Renate
3 Rennenbach and Ursula Caberta. (Rennenbach and Caberta have been engaged for the past
4 several years in attempts to discredit the Church through various means and have lobbied
5 various German government entities to essentially legalize discrimination against members of
6 the Church of Scientology because of their Church membership. In fact, Germany has been
7 censored for the past three years by the United Nations and the Helsinki Commission for just
8 such discrimination. The United States Department of State has also found a pattern of human
9 rights abuses by Germany against Church members.) During this appearance Armstrong
10 committed further violations of the Injunctions, making numerous prohibited statements. This
11 appearance was reported on in the October 28th edition of the *Frankfurter Rundschau*. A true
12 and correct copy of which is attached hereto as Exhibit O and a translation of which is
13 attached hereto as Exhibit P.

14 25. I am further informed and believe that on this same trip to Germany, Armstrong
15 gave interviews to at least three television interviewers which resulted in broadcasts on
16 Germany TV channels N-TV, B1 TV and SAT 1 TV. In addition to this, Armstrong was
17 interviewed by the regional newspaper *Taz*, resulting in the article of October 28, 1997, a true
18 and correct copy of which is attached hereto as Exhibit Q and a translation of which is
19 attached hereto as Exhibit R.

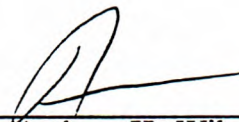
20 26. Armstrong's most recent violation of the Injunction came on November 26,
21 1997. On that date, Armstrong created another Internet posting which purported to be a
22 verbatim transcription of a complaint which Armstrong had recently filed in the United States
23 District Court for the District of Nevada. A true and correct copy of this posting is attached
24 hereto as Exhibit S. A review of this virtually unintelligible "complaint" reveals its true
25 nature, a cynical attempt to cloak Armstrong's anti-Scientology ravings with the litigation
26 privilege.

27 27. The recent violations of the Injunction in Great Britain and Germany have
28 forced the Church to expend a great deal of time and money to correct the multiplicity of

1 falsehoods and lies which Armstrong has promulgated. Armstrong's claimed expertise
2 concerning the Church, based on nothing more than having been the clerk entrusted with care
3 of certain of Mr. Hubbard's personal files, gives him a superficial credibility, even though he
4 has not been involved in any facet of the Scientology religion since 1981. Evidence of this is
5 the German media's false reference to Armstrong as Hubbard's "biographer." The Church
6 did not pay Armstrong to silence him, but to save itself the time and expense of responding to
7 and correcting every false allegation.

8 28. I notified Mr. Armstrong of this application by letter which was telecopied to
9 Mr. Armstrong, a true and correct copy of which is attached hereto and incorporated by
10 reference as Exhibit T.

11 I declare under penalty of perjury pursuant to the laws of the State of California that
12 the foregoing is true and correct. Executed this 1st day of ^{December}~~November~~ 1997 at San
13 Francisco, California.

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Andrew H. Wilson

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IN AND FOR THE SUPERIOR COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

--oOo--

CHURCH OF SCIENTOLOGY
INTERNATIONAL, a California
not-for-profit religious
corporation,

CERTIFIED
COPY

Plaintiff,

vs.

Case No. BC 052395

GERALD ARMSTRONG; DOES 1
through 25, inclusive,

Defendants.

DEPOSITION OF
GERALD ARMSTRONG

Wednesday, June 24, 1992

A

21.

REPORTED BY: SUSAN M. SKIGEN, CSR #5829

1 since, since '89.

2 Q. Okay.

3 A. When, I mean, I have, I have absolutely no
4 intention of honoring that settlement agreement. I
5 cannot. I cannot logically. I cannot ethically. I
6 cannot morally. I cannot psychically. I cannot
7 philosophically. I cannot spiritually. I cannot in any
8 way. And it is firmly my intention to not honor it.

9 Q. No matter what a court says?

10 A. No court could order it. They're going to
11 have to kill me.

12 Q. Well, let's just hope we don't have to turn
13 this into a death penalty case.

14 A. Into a what?

15 Q. A death penalty case.

16 A. Right, but you guys would.

17 Q. I'm not the one who stands up and pounds
18 the table and screams at people in this deposition, your
19 lawyer is. If I were to stand up at this deposition and
20 scream at you to shut up, would you consider that to be
21 an act of fair game?

22 A. I consider the whole thing --

23 Q. I know, but if I were to stand up and yell
24 at to you shut up, would you consider that to be fair
25 game?

22.

A

DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare

1. I am making this declaration to respond to the application (App.) of the Church of Scientology International, hereinafter referred to, along with the rest of Scientology's command and control structure, as "the organization," for an order to show cause why I should not be held in contempt of court, and to the declaration of Laurie J. Bartilson (LJB Dec.) dated December 31, 1992 on which said application is based.

2. Judge Breckenridge stated in his decision filed June 22, 1984, in the case of Scientology v. Armstrong, Los Angeles Superior Court No. C 420153, hereinafter referred to as Armstrong I, affirmed on appeal in Scientology v. Armstrong (1991) 232 Cal. App. 3d 1060, 283 Cal. Rptr. 917, that:

"[i]n addition to violating and abusing its own members civil rights, the organization over the years with its "Fair Game" doctrine has harassed and abused those persons not in the [organization] whom it perceives as enemies. The organization clearly is schizophrenic and paranoid..."

Ms. Bartilson is a member of the Scientology organization.

3. Ms. Bartilson states that on June 24, 1992 during a deposition in this litigation I asserted that I would never comply with the order of the Honorable Ronald M. Sohigian dated May 28, 1992, hereinafter referred to as the "Sohigian ruling,"

B

which denied in part and granted in part the organization's motion for a preliminary injunction brought to enforce the December 1986 "Mutual Release of All Claims and Settlement Agreement," hereinafter referred to as the "settlement agreement." (App. p. 3, l. 3; LJB Dec. p. 2, para. 4) When I state at page 124 of the June 24 deposition transcript that I have "absolutely no intention of honoring that settlement agreement," I mean exactly that. I do not mean the Sohigian ruling and Ms. Bartilson is something indiscernibly different from dishonest to so state in her sworn statements. The settlement agreement cannot be enforced, it is impossible for me to honor it, and Judge Sohigian refused to enforce it.

4. Ms. Bartilson states that on October 7, 1992, during a deposition in this case, I confirmed that I indicated to Los Angeles Times reporter Robert Welkos my intention not to comply with the Sohigian ruling. (App. p.4, n.4) Ms. Bartilson also states that my testimony from that deposition, which she quotes in her declaration, is an acknowledgement by me of my intention to wilfully disobey the terms of the Sohigian ruling. (LJB Dec. p.4, para. 5) There is not one word in my deposition testimony she has quoted, nor anywhere else, that would indicate to anyone with eyes to see, an intention by me to disobey the Sohigian ruling. My statement concerning the injunction, which Ms. Bartilson has quoted but woefully misinterpreted means only this: the organization moved the LA Superior Court for an order to enjoin me from doing anything not permitted by any or all of the

to him, get into his office by deception and steal his client files. The organization will do whatever it can to compromise me, any employer and any lawyer, and ruin any relationship of any kind I may develop with anyone. The organization's malice is certainly demonstrated in this effort to have me held in criminal contempt. Based on lies and perversions it wants me jailed for opposing its antisocial acts, and living my own life. I have no doubt that the organization leaders have plotted my assassination, nor that all my friends are at risk from the organization because of their association with me. I am working with Mr. Greene because he too is the target of this organization's attacks, because he understands, and because he — too does not think much of organized evil.

10. Ms. Bartilson claims that my execution of proofs of service on July 30, 1992 in the case of Aznaran v. Scientology, US District Court, Central District of California No. CV-88-1786-JMI(Ex) is an acknowledgement of my intention to wilfully disobey the Sohigian ruling (App. p.7, l.10; LJB Dec. p. 6, para. 11) It isn't. The Sohigian ruling is not intended to and does not prohibit such clerical tasks which can be done by anyone. Signing the proofs of service has nothing to do with my experiences in the organization, concerning which I can provide testimony to claimants and intended claimants only pursuant to subpoena. When I received and read the Sohigian ruling I sought to divine its meaning and apply it sensibly to my life, work and legal situation. If it meant precisely what it said then I would

have to stop breathing because by breathing I would be indirectly assisting any person litigating a claim against the organization entities referred to in sec. 1 of the settlement agreement.

Obviously, therefore, Judge Sohigian did not mean what he stated.

If he meant only that I could not, as opposed to passive assistance to litigating claimants such as breathing, living and writing magazine articles for the public generally, physically act to help such a claimant personally, I would have to ensure every little old lady or little old man I might escort across any old road was not such a claimant. I am certain Judge Sohigian did not intend that. Even an interpretation of the Sohigian ruling that I am prohibited from indirectly assisting any person litigating a claim against the organization entities in that litigation, in some way unrelated to my experiences in and potential testimony against the organization, leads to absurdities that Judge Sohigian also could not have intended. I recognized that the organization would interpret the Sohigian ruling in an absurd way because its way of interacting with me is crazy and its stock-in-trade is perversion of logic and truth; but I reasoned that I could not myself act in an absurd or illogical fashion and pervert truth out of fear of the organization's use of my God-given actions to attack me.


Following Ms. Bartilson's tortured logic, if I got a job as a clerk in the LA Superior Court, for the rest of my life I would not be able to receive, stamp or file any document from anyone involved in litigating a claim against any of the organization

entities. Nor could I answer the phone if a lawyer for such a claimant or even his organization opponents called the Court. If I got a job as a postal carrier I would have to refuse to deliver mail to and from any such claimant. If I became a cab driver I would have to question all my fares and refuse to carry any claimant or his lawyers or witnesses on their ways to meetings, depositions and trials. If the same illogic were permitted in settlement agreements in all cases, and became anywhere near usual in the litigation industry, nobody in this great country could do anything for anybody for fear of violating some non-assistance covenant. The opportunities for unscrupulous groups like the Scientology organization would be fantastic, for anyone who signed such an agreement could be easily framed with settlement violations. Coupled with \$50,000-a-crack liquidated damages clauses the economic possibilities are Hubbardian in megalomagnitude. Trick the clerk into opening an envelope containing anti-organization litigation papers; con the cabby into driving the wrong person to a deposition; photograph the postman delivering something to a litigant. But I do not believe Judge Sohigian intended such an interpretation of his ruling, and I do not believe such non-assistance covenants or orders are legal or do anything but obstruct the administration of justice and attempt to destroy mens' souls. I believe Judge Sohigian intended only that I cannot make my organizational experiences, which are unique to me, available as testimony to claimants or intended claimants except pursuant to a subpoena. For seventeen

ruling and, although, as stated above, I believe that, even as I interpret and respect it, the ruling is illegal, I have not acted in any way in contempt of it. I believe that Judge Sohigian created with his ruling an invitation for me to appeal it, and provided within the ruling itself the appeal's grounds: its fuzziness, its contradictions, its departure from his hearing comments, its rewriting of the settlement agreement's prohibitions, and its statutory and constitutional violations. I believe Judge Sohigian's ruling strategically left the organization, because it escaped with sudden relief after the previous day's hearing in which he sharply censured its unsavory practices, unwilling to appeal the ruling. This unwillingness is something different from the organization's pattern of appealing everything that can be appealed, and strikingly so here because Judge Sohigian refused to enforce all but the narrowest slice of the settlement agreement, and even that he rewrote in my favor. I believe he offered the organization an opportunity to redeem itself and it is now clear that his offer has not been accepted. I respect Judge Sohigian's intellect and person and am thankful he heard the injunction aspect of my case.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Anselmo, California, on February 2, 1993.



GERALD ARMSTRONG

© Gerald Armstrong

TO: BOWLES & CON

AUG-17-'93 TUE 08:26 ID.

TEL NO: 415-394-

#626 P03

AUG 15 '93 19:24 HUB 1 ALLFORD GREENE 415-456-5318

P.2/6

August 15, 1993

Andrew H. Wilson, Esquire
Wilson, Ryan & Campilongo
235 Montgomery Street
Suite 450
San Francisco, CA 94105

BY FAX (415) 954-0938

Re: CSI v. GERALD ARMSTRONG;
MICHAEL WALTON;
TEE-GEK-ACK,
Marin Superior Court No. 157680

Dear Mr. Wilson:

The above-referenced lawsuit has become Armstrong IV, and CSI v. Gerald Armstrong and Tee-Geek-Ack, LA Superior Court No. BC 084642, is Armstrong III. Armstrong II and I you and I and the courts are all clear about already.

What you have done in filing this lawsuit which you know to be bogus is dishonorable. I am preparing a litigation resolution, but it is a huge, month-consuming task, and I thought maybe there was still an opportunity for something different from litigation which could end it right away. As you know this is what I've tried to do for over 11 years, without, as you also know, much success. Nevertheless, I will attempt again an appeal for sense, so am writing you, this lawsuit's executioner, this letter.

So far, because nobody has come forward to say what I say I am having to say it myself. Appealing first to your fiscal psyche (you wouldn't argue that you're in it for the money, right?) I have spent some forty-one hours on IV, so let's say, \$2255.00, and \$400.00 costs. I'm not sure what Michael Walton's fees and costs are, but I'm fairly sure that if you decided to dismiss the complaint and withdraw the lis pendens immediately he would not object, and would be, I think, fair, in not only fees and costs but damages. An apology would be helpful, but I doubt that he'd even ask for one, let alone insist. In any case, now, as always, is certainly the time, if sense is to be a factor in this senseless lawsuit.

Having said that, I should acknowledge that I am not unaware of the fact that you have a monstrous monetary motivation to have the attacks on your client's "enemies" go on the rest of your career. There is some risk in this to your money mountain, of course, because a malicious prosecution action becomes so obvious in this litigation's solution to itself. Do not therefore, transfer any of your assets from this day forward, because there exists from the time of your first threat in the Armstrong II depositions, and, for your client, from December 6, 1986, a claim, regarding which I urge you to transmit a copy of this

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C

Andrew H. Wilson, Esquire

August 15, 1993

Page 2

letter to your insurance carrier. I also urge you to divulge to your carrier all of the facts known by you to underlie not only the Armstrong IV complaint, but II and III, which you have also prosecuted maliciously. If you didn't have a clue about what you were up to before this, please let this be clear notice. While you're at it, be sure to not withhold all the statements you're aware of that I've made that I represent to be fact, and which I say underlie I through IV. If I handled your insurance I would sure tell you to either dismiss IV, or get out of it if your client refuses to allow you to; and the same with II and III. If you're not depending on insurance, but your client's promise to pay for your defense and damages, I suppose I'd have to admit that to prolong your career you'd want to generate as many malicious lawsuits as humanly possible.

There is, then, the matter of your career, short, long or prolonged. I may have a different idea from yours about lawyers, good ones and bad. It's easy to see, in order to stay blind, that making a mess of money, by any means, makes a lawyer good. To me, money and goodness are, in all arguable relationships, unrelated. It is honesty, fairness, discipline, sense and support for those things in justice's system that make goodness in lawyers. Some good lawyers are rich, some are poor. Some bad lawyers are rich, and some again are poor, but all bad lawyers are dishonest, unfair, undisciplined and dense, and it's they who give their profession the reputation it shouldn't deserve. As I said, however, you may have a different view, perhaps something more Hubbardian, of a career in goodness or badness.

Please do not kid yourself that because I have not been destroyed utterly, as Hubbard ordered in his basic litigation policies, your lawsuits are not terrifying, and do not profoundly distress me. Only a madman, even in this litigious land, is not threatened by being named a defendant in any lawsuit to which our courts give numbers and their awful power. Only Rip Van Winkle would not recognize your client as the most vicious litigation machine this land has ever beheld. I am neither mad nor Rip.

You and I both know that your lawsuits are frivolous; but please also realize that I am aware that you know that the fact of their frivolousness does not diminish their danger. In fact, as we both know, their frivolous nature adds to the threat. The organization, as you know, because you know of intel ops going down all the time and sign your name to much of the frivolity, uses litigation to cover, divert attention from, and render incredible or plausibly deniable what's really going on: its secret war of secret meetings, secret orders, secret operatives, secret files, secret accounts, of ambushes, assaults, arsenals and abominations. The latest frivolous flurry - Armstrong III and IV, and their now growing case files - I view as a render-

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Andrew H. Wilson, Esquire
August 15, 1993
Page 3

incredible operation. Your client's position would be, "Why would we kill Armstrong; after all we had just sued him and expected to get a judgment against him for millions of dollars?" If you consider in your assisting of your client that it is too rational or controlled to engage in something as unseemly as assassination, please be on notice that it is neither.

You know me. You've deposed me. You've seen me in courtrooms and hallways. You've read my letters, and either read dozens of my deposition transcripts and volumes of my declarations, or you've deliberately not read them in order for rotten reasons to keep yourself ignorant. You promised to ask your client, David Miscavige, to return the manuscript he had stolen from my car. You've read my IRS book manuscript. You know of operations, PIs, intel, lies, assaults, a list of lawfirms, lawsuits, lawyers and losses as long as your leg. You know that thousands (the org has been saying six million for twenty years; but in any case plenty) of persons around the world are available as perjurers, paralegals or pawns to assist you to assist your client in its litigation goals.

The obvious goals of the II, III and IV litigation package are to silence me and take revenge for my refusal to be silenced. In furtherance of those goals, in Armstrong IV you seek to take away my friend Michael Walton's house, cause him and his family trouble, and in all your lawsuits to cause me trouble, and attack Tea-Gee-Ack's assets and cause it trouble. The organization has other goals in the Armstrong litigation that really are intended to feed its insatiable intelligence appetite, which it camouflages with the uproariously transparent label of "legitimate discovery." It should be clear after three years (using your also uproarious date of February, 1990), three lawsuits, three shots at contempt, more than three media mentions, at least three more books on the subject, and a screen play, that I cannot legally be silenced. Your client's waivers of any right or standing to enforce the now unmercifully silly settlement agreement are strewn along the litigation's length. That aspect of your war with me has long since been lost. The courts of this country have not acceded to your demands that I be silenced, and now they never will.

Without a prayer of achieving its litigation goal of silence, the organization is left with only naked revenge for my rejection of its suppression. Our courts, as you might remember, have often acted to prevent their participation in litigation for revenge; often enough, I would think, to give pause to anyone but the completely insane who would contemplate their use for that base purpose. Revenge itself, a basic Hubbardian policy, although not an invention for which either his estate or the organization holds the patent, is what makes the completely

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Andrew H. Wilson, Esquire

August 18, 1993

Page 4

insane completely insane and certainly insane enough to blind themselves to how crazy revenge really is. It can never accomplish its goal, has no real effect, but since its practitioners consider its effects real (otherwise why indulge in it) it does have the apparent effect of rendering them crazier and crazier. That effect is apparent in the 4 Armstrong cases; the practitioners therein have become crazier and crazier.

There is a legal point, concerning which revenge admittedly may have blinded you, that, even if you decide not to dismiss or exit Armstrong IV, I request that you respond to immediately. You have claimed that:

"Beginning in February, 1990, and continuing unabated until the present, Armstrong has breached the Agreement wilfully and repeatedly, including, inter alia, the provisions of Paragraph 7(D) of the Agreement which require Armstrong to pay plaintiff liquidated damages for each such breach." (Complaint, p. 7, para. 22)

The settlement agreement states at page 8, para. 7(D) that the organization "would be entitled to liquidated damages in the amount of \$50,000 for each such breach." If my breaching of the agreement has continued unabated, there could have been but one breach from February, 1990 forward. Your breaking of that big, bountiful and, as you say, unabated, breach into artificial parts is a contrivance to pad your client's damages, which is, funnily enough, frigging fraud; and I would appreciate your addressing of that damage padding fraud in your response to this letter.

I have written you and Ms. Bartilson before on the subject of mitigation of damages, and I have felt that it is something you have both not well understood, but I will try again here. I have a duty to mitigate damages, and I am damaged each time you tack on another 50 G's for every artificial part into which you divide my life. You have also noted, as I've noted above, that my breaching of the agreement has continued unabated since 1990. It is my duty, therefore, to continue that breach unabated until the agreement is rescinded and no longer exists to be breached. This letter thus also serves to advise you and your client that I am continuing unabated. Please also advise your client to not waste its victims "donations" sending around its camera-toting FIs to try to catch me in an instant when I am doing something other than my unbroken breach. If I am not heard to be breaching the agreement at any moment, I have not stopped doing so, but am just between words or breaching in a whisper. Even in my sleep, though I may not be somniloquizing, I am in every instant breaching the agreement. Please be assured that it is my intention to thus do without ceasing whatever I can to mitigate my damages; and your client's. Even a fool would see that it would be stupid of me to belay my thus far unabated breach, because your client will just do something, as it has done, also

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TO: BOWLES & XON

AUG-17-'93 TUE 08:38 ID:...

TEL NO: 415-394-...

#525 P87

P.6/6

AUG 15 '93 19:27 HUB LAW/FORD GREENE 415-456-5318

Andrew H. Wilson, Esquire
August 15, 1993
Page 5

relatively unabatedly, from December, 1986 through present time, to force, goad, trick or trap me into a second breach. Obviously the resolution lies in what I've been saying for years: rewrite the settlement agreement.

If you haven't sensed that your client is paying you to give it only bad advice, please do so now. If you're being paid to not advise your client, be advised that practically anyone (even I) can give it the same advice for practically nothing. I actually do have some advice for both you and your client. Please, look into your hearts and truly question the sense of what you do. If you have trouble looking into your hearts, give me a call because I can help.

And that brings us to the non-litigation resolution of your client's problems, which is really the purpose of this letter. If I really desired to foment litigation, as you repeat so religiously, would I honestly have been so dedicated through all these years to having your client realize the futility of litigation as the solution to its problems? The fact that it sees litigation as a solution is really why its problems persist. Honest, open communication would work, but your client refuses to try it, opting instead for the avoidance of communication by hiding behind layers of lawyers and litigation. Its communications not screened through its lawyers are dishonest and secret. Its leaders hide behind their "own" lawyers and layers of lies and should not be its leaders because its people deserve in their leaders courage, honesty and openness. So again, I extend to you and to your client the invitation to meet with me honestly and openly for the purpose of communication towards the resolution of our conflicts. I will wait until August 17 before I do anything more with this letter. I'm now up to 45 1/2 hours and working hard.

Please look in your hearts and see what you find there.

With a prayer for peace, I remain, yours sincerely,

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415) 456-8450

Hub Law Offices
711 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415) 258-0360
Fax 456-5318



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FILED

1995 02 19

MARIN COUNTY CLERK
BY: E. Kerwick, Deputy

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10 Hollywood, CA 90028
11 (213) 960-1936
12 TELEFAX: (213) 953-3351

13 Attorneys for Plaintiff
14 CHURCH OF SCIENTOLOGY INTERNATIONAL

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 FOR THE COUNTY OF MARIN

17 BY FAX

18 CHURCH OF SCIENTOLOGY INTERNATIONAL,) CASE NO. 157 680
19 a California not-for-profit)
20 religious corporation;) [CONSOLIDATED]

21 Plaintiff,

22 JUDGMENT

23 vs.

24 Trial Date: Vacated

25 GERALD ARMSTRONG; DOES 1 through 25,)
26 inclusive,)

27 Defendants.)
28

29 On October 6, 1995, the Court granted the motion of Plaintiff
30 made under Code of Civil Procedure §437(c) on the ground that there
31 is no defense to the action, and that judgment be entered for
32 Plaintiff and against Defendants on the 13th, 16th, 17th and 19th
33 causes of action of the Second Amended Complaint.

34 On January 27, 1995, the Court granted the motion of Plaintiff
35 made under Code of Civil Procedure §437(c) on the ground that there
36 was no defense to the action, for an order that judgment be entered
37 for Plaintiff and against Defendants on the 4th and 6th causes of

WILSON, RYAN & CAMPILONGO
115 Sansome Street, Suite 400
San Francisco, California 94104

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1 action of the Second Amended Complaint.

2 On October 5, 1995, the Court granted the motion of Plaintiff,
3 made under Code of Civil Procedure §437(c) on the ground that there
4 was no defense to the action, for an order that a permanent
5 injunction be entered on behalf of Plaintiff and against Defendants.

6 On August 16, 1994, the Superior Court of California, County of
7 Los Angeles, in which this action was then pending, granted the
8 motion of Defendants under Code of Civil Procedure §437(c) on the
9 ground that the causes of action asserted in the 2nd and 3rd causes
10 of action on the Cross-Complaint of Gerald Armstrong, for an order
11 that judgment be entered for Defendants and against Plaintiffs on
12 said causes of action.

13 On March 7, 1996, the Court granted the motion of Cross-
14 Defendant Church of Scientology made on the Code of Civil Procedure
15 §437(c) on the ground that the action had no merit on the remaining
16 claims set forth in the Cross-Complaint of Gerald Armstrong.

17 On February 21, 1996, Plaintiff filed its Cost Bill herein,
18 seeking costs in the amount of \$334,671.75.

19 In accordance with the above orders,

20 IT IS ORDERED, ADJUDGED AND DECREED that Plaintiff shall
21 recover from Defendant the principal sum of \$300,000 plus interest
22 at the legal rate from the date of such orders in the sum of
23 \$21,923, for a total sum of \$321,923.

24 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the judgment
25 of permanent injunction shall be entered against Defendant Armstrong
26 in accordance with that certain ORDER OF PERMANENT INJUNCTION signed
27 by this Court on October 17, 1995, a copy of which is attached
28 hereto as Exhibit A.

1 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Cross-
2 Defendant shall have judgment against Cross-Complainant upon the
3 Cross-Complaint of Gerald Armstrong.

4 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Plaintiff
5 shall recover from Defendant its costs in the sum of \$334,671.75.

6
7 Dated: APRIL 29, 1996

Sam W. Thomas
JUDGE OF THE SUPERIOR COURT

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From - Tue Sep 02 05:00 1997
Path: nntp.earthlin et!mr.net!zdc-e!super.zippa !lotsanews.com!howland.erols
.net!infeed1.internetmci.com!newsfeed.internetmci.com!199.60.229.5!feta.direct.ca
!newsfeed.direct.ca!news.bctel.net!news.rapidnet.net!not-for-mail
From: armstrong@ntonline.com (germy armstrong)
Newsgroups: alt.religion.scientology
Subject: Tilman's Question Re 1982 PI Harassment of G Armstrong
Date: Tue, 02 Sep 1997 03:15:51 GMT
Organization: Rapidnet Technologies Internet
Lines: 83
Message-ID: <340b84e3.6433090@news.rapidnet.net>
NNTP-Posting-Host: cp030.rapidnet.net
X-Newsreader: Forte Free Agent 1.11/16.235

Tilman asked the following question which I found on Deja News. (I don't get all ars posts on my news reader.)

In <3403bcf7.13770246@news.rapidnet.net>, armstrong@ntonline.com (germy armstrong) wrote:

>also hired individuals who followed and surveilled GA, assaulted
>him, struck him bodily with a car, and attempted to involve him in
>a freeway accident.

Can you tell us more about this? I would like to hear the name of these people.

The PIs hired by Scientology who harassed my wife Jocelyn and me in the summer of 1982 were from the Tin Goose Agency in southern California.

I think the principles in the company were Gene Tinch and Henry Goosen, who, I also think, they were ex LA law enforcement officers.

Scientology had PIs stake out our home, follow us and generally terrify us around the clock for about a month period in 1982, until a LA Superior Court judge let them know they better knock it off.

I was never able to get the names of the individuals who made the criminal contact with me, although I saw one of them later by chance on TV.

I picked up surveillance outside my home in Costa Mesa, California sometime in or around May, 1982. In August I was able to detain a PI by putting my leg under his car wheel and having Jocelyn call the local police. I was able to get this person's name through the police, although I don't have it with me at this time. Greg something, I believe.

Later in August I again spotted surveillance across the highway from my home; a guy with binoculars in a car. I slipped out of my home with a camera, without the guy knowing. I approached him, taking his photo as I moved toward him. He moved toward me and pushed me around with his hands, striking my chest. I yelled assault, told him to take his hands off me, waved at passing traffic, and yelled to Jocelyn, not knowing if she could hear me. The guy then began pushing me around with his body. I figured he wanted to maneuver me behind nearby buildings out of sight of passers-by, where he could take care of me. I can't help being unlarge, unintimidating and unable to beat on much bigger bullies. Thankfully Jocelyn rolled up in our car, and the guy

Some years later I saw the guy on TV acting as corner man for Michael Nunn. Nunn was a world class boxer, I think middle weight, and may have held a title or two. He was then managed by the Tin Goose group. Tinch and Goosen had apparently branched out into training/managing professional boxers. The corner man, who had assaulted me in 1982, was identified by the commentator as a brother of Henry Goosen.

On another occasion, also in August, 1982, another one of the PIs was following Jocelyn and me during our lunch break from our work. We both were very weary and distraught from the 24 hr a day following and spying on us. I stopped and got out of our car and approached his vehicle. He swung toward me and smacked my elbow with the side of his car.

The same guy later got right in front of us on the highway and slammed on his brakes. We had an old Datsun 510, in not very good condition. A first car after the Sea Org; which other SO escapees would understand. So the incident was pretty terrifying.

We went past the guy; then he came along side and crossed into our lane as if to force us off the highway. I think we all were very fortunate that no crash occurred, because this guy was doing things which were reckless and criminal.

I have photos (not with me) of four of the PIs and a detailed chronology of these events and the rest of the harassment from that period.

That period, by the way, is during David Miscavige's running of Scientology, and running of its PIs. These events cannot be ascribed to the criminal Guardian Office.

Subject: Re: CoS as Mafia (Was Re: Germany Starts Branding Scientologists)

Date: Tue, 14 Oct 1997 05:43:00 GMT

From: armstrong@ntonline.com (gerry armstrong)

Organization: Rapidnet Technologies Internet

Newsgroups: alt.religion.scientology

On Sun, 12 Oct 1997 04:07:54 GMT, referen@bway.net (Diane Richardson) wrote:

>On Sun, 12 Oct 1997 01:09:47 GMT, grady@tidepool.com (Grady Ward)

>wrote:

>

>>>

>>>Do you believe that similar steps should be taken by the U.S.

>>>government? Should all businesses owned by Scientologists[tm] be

>>>labeled and prospective employees warned? What makes this different

>>

>>No, I don't. However I guess we both also agree that we ought to keep lawfully

>>investigating this criminal cult for the mischief that is an organic part of

>>their nature.

>

>Investigating an organization is not equal to investigating

>individuals who happen to belong to the organization. The government

>can investigate individuals who belong to the Mafia if those

>individuals are suspected of criminal activity. The same goes for

>Scientologists[tm]. What the U.S. government cannot do is to label

>pejoratively all individuals who belong to a group, whether that group

>is the Mafia or the CoS.

>

>Diane Richardson

>referen@bway.net

>

>

Yes, the US can, does and should. "Gang member" is a pejorative. So is "convicted felon." So is a member of the "Cultists Dedicated to the Destruction of Sanity for Our Leaders' Own Pernicious Purposes." The US uses such labels in its legal briefs and other public statements.

Scientologists, to be Scientologists, must do exactly what they're told to do by the cult's leadership. That fact should be used by the US in its legal public statements concerning Scientology, or Scientologists acting for Scientology. The leadership of Scientology is involved in a mafia-like criminal enterprise: fraud, extortion, human rights abuses, etc. When the leadership eliminates all such criminal practices from its operations the US would then be justified in removing the pejorative label "Scientologist" from its legal public statements concerning Scientology or Scientologists acting for Scientology.

Any country is completely justified in calling Scientologists "Scientologists" and treating them as if they are under the domination of a cabal of criminals dedicated to the destruction of sanity in that country's citizens and institutions for the cabal's own pernicious purposes, because that is what Scientologists are. It has almost nothing to do with the Scientologists' "beliefs" about the "tech," "ARC," or etc., etc. Those things are just part of

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Scientologists doing what they're told to do: believe this, believe that, don't believe this or that, read this, say that, do this, don't do that, tell this lie, hurt that guy. All for the leaders' own pernicious purposes. That's the danger that people in governments have come face to face with. Germany has apparently said, "This is not right." The US has apparently said, "Wow, what a great idea."

But the US is wrong. It isn't a great idea. It isn't right.

Gerry

Subject: Lie Lie Lie, Lie Lie Lie Lie Lie Lie Lie Lie Lie Lie Lie

Date: Tue, 14 Oct 1997 05:38:22 GMT

From: armstrong@ntonline.com (gerry armstrong)

Organization: Rapidnet Technologies Internet

Newsgroups: alt.religion.scientology

Everyone knows that Hubbard said that he had to lie to people to control them.

He was only telling a bit of his truth; that is, he was lying. The way Hubbard really controlled people and his replacement model controls them is to get them to lie for him. Once a person lies for the cult he is in its control. If he quits lying for the cult he is no longer in its control, and no longer a Scientologist.

Having people lie starts with their first success story. If they tell the truth they cannot continue in Scientology. They lie after every auditing session and after every level up the grade chart. They lie about abilities gained and "OT phenomena." They lie about Scientology every time they "disseminate."

As people advance in Scientology they are required to tell different organizational lies. The top Scientologists, those who have advanced farthest in this "applied religious philosophy," are required to commit perjury in court. They lie about who runs Scientology. They lie about its history, nature, finances and intentions. They lie about the GO, OSA, Hubbard and Miscavige.

If anyone refuses to tell a lie he is hauled "off lines" and could easily become fair game. He knows that if that happens everyone in the organization will lie about him.

Scientology's black PR/DA practices are in large part intended for the controlled cult members. As long as the OSA PR and legal operatives spread lies about people who are telling the truth about the cult, these operatives remain controlled. Get all Scientologists to lie about the people telling the truth and you control all Scientologists. If the operatives or Scientologists refuse to spread the black PR they are out of control and must be themselves black PRed lest their dedication to the truth infect the cult.

It is an organization based on telling lies. All of its lies trace back to Hubbard and Miscavige, the source and the source's apprentice. They are also the chain of lies' weakest links. Who but fearful criminals require that the people in their control lie for them? And who but criminals would have such disdain for people in their care?

Gerry

Subject: Re: Who Am I?

Date: Tue, 14 Oct 1997 06:08:27 GMT

From: armstrong@ntonline.com (gerry armstrong)

Organization: Rapidnet Technologies Internet

Newsgroups: alt.religion.scientology

On Wed, 8 Oct 1997 08:07:00 GMT, hkhenson@netcom.com (Keith Henson) wrote:

>the_skeptic@rocketmail.com wrote:

>: Re: Who Am I?

>

>: 2. I am under no restraint or coercion concerning the
>: contents of any of my postings, save my own personal judgement and my own
>: sworn oaths.

>

>

>: 4. I will answer any *reasonable* questions regarding my knowledge and
>: experience as a Sea Org staff member and as a Scientologist, providing I
>: can do so without violating my sworn oath of defense of Scientology and
>: Scientologists. I promise to either answer (to the best of my ability),
>: state that I do not know about a particular matter or state that I choose
>: not discuss it.

>

>Certainly this sounds fair.

>

>

Hello Skeptic:

You could be a breath of fresh air, which I for one feel your organization deliberately denies us.

First of all, I would like to deal with your bias.

1. What is the precise language of your "sworn oath of defense of Scientology and Scientologists?"
2. When was that oath or those oaths sworn to?
3. What were the relevant circumstances at the time you swore said oath or oaths?
4. Are there any circumstances you can imagine which would render right or just your breaking of said oath or oaths?
5. If, for example, you discovered that Scientology, as many of us here observe, is abusing innocent people, would you continue to defend it?
6. Wouldn't your adherence to such an oath make you also a contributor to the abuse of innocent people?
7. Wouldn't your adherence to such an oath also render your defense of your organization irrational? (Given of course that abuse of innocent people is irrational.) And wouldn't your posts to this NG in defense of an organization engaging in such abuse be untrustworthy?
8. It seems to me that an oath to defend innocent people against abuse and abusers is a far more worthy and rational guideline for one's arguments and life. Is it not possible that an abusing organization

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requiring of its members an oath of unquestioned defense is abusing those members?

>: 5. I am willing to carry on a discussion of Scientology matters with
>: anyone in this newsgroup who wishes to conduct a calm, polite, critical
>: debate. I don't have any problem with people disagreeing with what I have
>: to say [actually, I expect most of you to disagree with *most* of what I
>: have to say]; but, please stick to calm, rational arguments in response -
>: childish name-calling, vicious slurs, loud tirades, wild rantings, and the
>: like will simply be ignored and cause me to cease responding to the
>: offender.

Perhaps you will see that slurs, rants, etc have occurred when real questions, polite requests for debate and rational arguments have been ignored by Scientology's posters to this NG. I have asked a number of questions and so far received nothing but slurs and irrational attacks. Something different would be, as I said, fresh air.

>: 6. With regard to principles of Scientology philosophy or technology, I do
>: not "believe" anything. I have had the opportunity to study and apply
>: portions of this subject to my life with uniform success, when applied
>: exactly as found in my materials. A far larger portion of this subject, I
>: have either not studied, or have not had the opportunity to personally
>: test; therefore, I am not qualified to comment upon such areas. I shall
>: endeavour to carefully distinguish these two categories in all my postings
>: to this newsgroup.
>

I do not believe that you do not believe anything regarding these principles. You are told by Hubbard that Scientology does not depend on beliefs or faith. You believe that, I believe. You also, at this time, believe that it is right and ethical that you honor your oath to defend Scientology and Scientologists. I believe that Hubbard has lied to, and indeed defrauded, the people who believe in him and his "philosophy" and "technology" by telling them and leading them to believe that his subject does not require belief (and therefore that Scientologists as opposed to, e.g., Christians, are not believing in their "religion.")

9. For my understanding and our further discussions, what are the principles of Scientology philosophy or technology you are referring to above?

10. Scientology claims that a Scientologist is someone who adheres to the creed of Scientology. The creed contains a number of beliefs stated as beliefs; e.g., that man has an inalienable right to speak freely. If you do not have any beliefs about Scientology, do you not subscribe to its creed? And if you do not hold your creed's beliefs how can you be a Scientologist?

11. As you probably know, Scientology has sought to silence me about my knowledge of and experience in the organization, your religion. It has sought my silence with a "settlement contract," with threats, with litigation and with court orders. Are not your organization leaders, by seeking to silence me, in conscious and continual violation of Scientology's creed? Are they therefore not sham Scientologists? And since I do not seek to silence anyone about anything, am I not a true Scientologist?

I really have no trouble with Scientology's creed. I have some trouble with its use by organization leaders to obtain IRS tax exemption when

they violate it knowingly every day of the year.

>

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>:

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>: So much for an introduction.

>

>: Regards,

>

>: The_Skeptic@rocketmail.com

>

>Thank you very much for introducing yourself. When and if you want
>background material on memes, ask and I will either send it to you in
>email or point you to a web site.

>

>Keith Henson

Yes, thanks for your introduction and your promise of willingness to
respond to calm answers such as mine above.

Gerry Armstrong

From - Mon Oct 20 06:23:04 1997
Path: wn7!bgtf2!worldnet.att.net!news-peer.sprintlink.net!news-peer-west.sprintlink.net!news.sprintlink.net!Sprint!newsfeed.direct.ca!news.bctel.net!news.rapidnet.net!
!not-for-mail
From: armstrong@ntonline.com (gerry armstrong)
Newsgroups: alt.religion.scientology
Subject: Scientology Threatens Channel 4 TV in UK
Date: Mon, 20 Oct 1997 00:51:00 GMT
Organization: Rapidnet Technologies Internet
Lines: 47
Message-ID: <344aa9e7.3449839@news.rapidnet.net>
NNTP-Posting-Host: cp005.rapidnet.net
X-Newsreader: Forte Free Agent 1.11/16.235

As is probably well known 3BM Television has produced for Channel 4 a documentary biography of Hubbard.

As I understand it, Scientology representatives have been threatening Channel 4 to prevent the airing of the program. The threat, as it relates to me and that I know about, is of obtaining an injunction based on the charge that 3BM induced me to breach the 1986 settlement "agreement" and the Marin County California judgment which prohibit me from speaking about Scientology, Hubbard and so forth.

3BM did not induce me to breach any agreement or judgment. The fact is I am willing to communicate to anyone about Scientology or Hubbard and my experiences therewith at any time (you can't hold down a good grade zero release) and require no inducement. I was more than willing to be interviewed by 3BM in order to have the opportunity to make known Scientology's obtaining its tax exemption in the US by the submission of false statements to the IRS.

But even if I had been induced, the "agreement" was obtained illegally; and even if it had not been obtained illegally it is illegal on its face. The judgment is equally illegal.

What Scientology is seeking to do is prevent someone from talking about a dead founder of a "religion." If it is for any reason legal in the UK to prevent someone from talking about the dead founder of Scientology, it is equally legal to prevent someone for any reason from talking about the dead founder (even if that founder, as opposed to Hubbard, had been resurrected from the dead) of any religion. Since it is not legal for any reason to prevent someone from talking about Mohammed, Buddha, Confucius, Abraham, Lao-tzu, /~~18~~ or Jesus of Nazareth, it is not legal to prevent anyone from talking about Hubbard. If it is conceivably legal to prevent anyone for any reason from talking about any of these religious founders there is no freedom of religion. Who but Scientology would want no one to be permitted legally to talk about these religious founders? Who but Scientology is seeking to destroy freedom of religion in the UK?

Anyone who has an interest, check out this story. Post Channel 4's e-mail and street addresses and other data and contact them. Write them and tell them for the sake of religious freedom to not be shuddered into silence by the anti-religion Scientology. Roland can organize a picket. Someone else can present it to Parliament.

Let the media in the UK know. Drum up interest. And drum the cult out of the anti-religion business.

Gerry

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I

Subject: Re: Question to (Ex?)Members, concerning other religions

Date: Mon, 20 Oct 1997 22:26:35 GMT

From: armstrong@ntonline.com (gerry armstrong)

Organization: Rapidnet Technologies Internet

Newsgroups: alt.religion.scientology

On Mon, 20 Oct 1997 12:19:01 +0100, Dave Bird---St Hippo of Augustine
<dave@.demon.co.uk> wrote:

>

>

> Scientology presents itself in W.I.S. as "an applied religious

> philosophy" compatible with other religious beliefs. I know

> this is a somewhat disputed statement but....

>

> In your estimate, what percentage of staff or public Scientologists

> (in the area/nation where you were a member) were in fact active

> believers in other religions during their membership?

>

Zero!

> What religion and denomination were they??

>

I recently saw an ethics order on someone kicking them out of
Scientology for remaining a member of the Methodist Church.

It was absolutely forbidden in every part of the Scientology
enterprise where I was (Vancouver, Apollo, Dunedin, Clearwater, La
Quinta, Gilman Hotsprings, Los Angeles) for anyone to be an active
believer in any [other] religion and remain in the org. There was a
couple in the RPF in Clearwater who announced their belief in God.
They were guarded, sec checked, made to sign "crimes" culled from
their pc folders, made to accept a "freeloader debt," and finally
"off-loaded."

It was common "knowledge" in the organization that people who believed
in God were "psychotic" and were treated as such. Such people could of
course be used to forward Scientology's public relations goals.

During the "Apollo" years, the 400+ people on board never admitted to
being Scientologists, and it was a security violation, punishable with
a "treason condition," if anyone let slip to a "wog" that he or she
was a Scientologist, or that Scientology was operating on board. Our
cover was "Operation and Transport Corporation" of Panama, a business
management company. If anyone was asked by a wog in the ports we
visited what his or her religion was, the person was drilled to state
the religion he or she was raised in; e.g., Catholic, Presbyterian,
Lutheran.

This shows the facility of Scientologists in lying. The same facility
is shown in the organization's claim of compatibility with [other]
religions. Scientology at its core is dedicated to the destruction of
[other] religions. Which to the facile Scientologists is just another
way of saying that they are all compatible.

Gerry

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J

Subject: Letter to CSCE re Scientology's Religious Persecution

Date: Thu, 23 Oct 1997 18:01:27 GMT

From: armstrong@ntonline.com (gerry armstrong)

Organization: Rapidnet Technologies Internet

Newsgroups: alt.religion.scientology

I mailed this letter a while ago. Thought everyone should know:

Commission on Security and Cooperation in Europe
Sen. Alfonse D'Amato, Chairman,
Rep. Christopher H. Smith, Co-Chairman,
and all Commissioners
Ford House Office Building, Room 234
Washington, D.C. 20515

Re: Religious Intolerance in Europe: the Scientology connection

I have learned that the CSCE is holding hearings on this subject, and I wish to add to your discussion some of my experiences, knowledge and opinions.

I know that some Scientology celebrities and perhaps some apologists for the organization have spoken to the Commission. I also understand that Scientology's claim of religious persecution in Europe, particularly Germany, is the basis for these celebrities' appearance at the hearing and one of the bases for the hearing itself.

In my opinion it is Scientology's own persecution of its members, ex-members and critics which is the source of most of its problems in Europe. I believe that Scientology's use of the shield of religion to carry out its abuses and persecutions is a real threat to freedom for legitimate, non-abusive religions. I believe that the US has turned its back on the victims of Scientology's abuses and persecutions, the very individuals who should be protected by the Constitutional guarantee of religious freedom. Finally, I believe that until it is willing to examine and act to curtail its own brand of religious persecution the US will lack the probity to preach about other countries' religious persecutions.

It is my prayer for this Commission that it urge the US to take the lead in eliminating religious persecution by examining and dealing with the religious persecution within its own borders and exported by its own organizations.

I am writing to you from Canada. Earlier this year it was necessary for me to leave the US, where I had been a resident since 1975, because I am the target of the Scientology organization's religious persecution in your country. This persecution, using the power and authority of the US legal system, resulted in a court order which prohibits me, on penalty of being jailed and fined, from mentioning Scientology or Scientologists or discussing my Scientology experiences.

I believe that this court order is illegal and that Scientology procured it by illegal means. It impermissibly denies me freedom of speech, freedom of religion, freedom of association and due process. In effect it results in a form of legal and

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psychological slavery. I am in Canada where I am free to discuss Scientology and my experiences, and where I may freely express my religious thoughts about this "religion."

The Scientology organization is well known for its policy of "using the law to harass." It spends many millions of dollars every year on lawyers and private investigators to harass individuals it designates as "enemy" targets. It overwhelms these targeted individuals with aggressive litigation, financial ruination, and extralegal operations and threats. Very few people have the money, strength or courage to stand up to this organization and its antisocial tactics. Even the US government, while it has stood up to military aggression of tyrannical foreign national regimes, has succumbed to the "religious" aggression of this US-based "church" of Scientology.

I was in Scientology from 1969 through 1981, spending most of those years with its founder L. Ron Hubbard in the Sea Organization, Scientology's "elite" pseudo-military corps. I was on the Sea Org ship "Apollo" with Hubbard, where I was posted as, inter alia, the ship's legal officer and intelligence officer. Hubbard patterned his intelligence apparatus on the system of Nazi spy master Reinhard Gehlen. Scientology operates as a global intelligence organization collecting overt and covert information on individuals, other organizations and governments and running covert operations against its "enemies."

During my Sea Org years I was twice assigned by Hubbard personally to Scientology's Rehabilitation Project Force ("RPF"), first in Florida, then in California, for a total of 25 months. The RPF is a penal camp created by Hubbard to punish anyone he felt crossed his will, or he even just disliked. People were assigned arbitrarily, for something as slight as a needle movement on the E-meter, the electro-psychometer Scientology calls for "legal" reasons a "religious artifact," but which in reality is a lie detector. I was assigned by Hubbard the first time for "insubordination," and the second time because he considered I was "joking." During much of my RPF sentence I was the "Bosun," the highest RPF member and in charge of the group. I became intimately familiar with RPF policies and practices.

The RPF is, and is intended to be, a degrading experience to break the will of the person assigned. RPF members were segregated, did physical or menial labor for little or no pay, were required to run everywhere, and ate whatever was left after the regular Scientology staff members finished eating. Telephone calls from RPF members to their family were only by specific permission and were monitored. All mail from RPF members was first read by security personnel. Anyone who took the punishment of RPF assignment lightly was assigned to the RPF's RPF, an even more degrading experience. People assigned were not free to leave, and anyone who did wish to leave was guarded and held until he had, among other things, signed a list of his "crimes" extracted from his "auditing" files.

Auditing is Scientology's psychotherapeutic processing, which it claims produces increased abilities and awareness. Statements made by a person being audited are recorded by an "auditor." These statements, which include the person's innermost thoughts, embarrassing incidents from his past, his sexual history, acts which might be legally prosecutable, etc. are available to and used by the intelligence personnel and leaders of the organization for non-therapeutic purposes, such as

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domination, intel operations or blackmail. Scientology promotes to the public that statements made in auditing are confidential. They are not.

My last position inside Scientology involved assembling an archive of Hubbard's personal documents and providing research assistance to non-Scientologist author Omar Garrison who had been contracted to write Hubbard's biography. In the course of my research I uncovered and documented pervasive fraud concerning representations made by Hubbard and Scientology about his past, credentials, accomplishments, intentions and the claims and efficacy of his psychotherapeutic "mental technology." I attempted to get Scientology's leaders to correct the fraud, and as a result I was ordered to a "security check," an interrogation employing the E-meter.

I saw that the trust I had placed in Hubbard and Scientology had been betrayed from the very beginning, that the organization's leaders were ill-intentioned, and that the fraud I sought to correct would continue. My wife and I were fortunate in being able to escape from the organization, because if we had announced our intention to leave we would have been separated and locked up. I had seen many people locked up and guarded inside, and I had been locked up and kept under guard myself.

Shortly after I left, Scientology published "Suppressive Person Declares" on me, falsely accusing me of crimes and high crimes including promulgating false information about Hubbard and Scientology. The organization's declaring someone a "suppressive person," or "SP," subjects him to its infamous and judicially condemned "Fair Game Doctrine," which permits SPs to be "deprived of property, injured by any means by any Scientologist... tricked, sued, or lied to or destroyed." Being "declared" by Scientology can be a terrifying experience.

During the first few months after I left the organization I learned of an intelligence operation being conducted against me and picked up surveillance. Scientology personnel also stole photographs I possessed. Knowing that my wife's and my life were in danger, I obtained from Garrison, with his permission, certain documents I believed I would need to defend us. I sent these to attorneys who had agreed to represent me, one of whom was Michael Flynn, then Scientology's most prominent lawyer enemy.

From the time I left the organization until the present I have been the target of fair game. Acts against me by Scientology agents pursuant to this basic Scientology policy include:

- filing five lawsuits against me;
- following, surveilling and harassing me and my wife;
- spying in our windows and upsetting our neighbors;
- attempting to involve us in a freeway "accident;"
- assaulting me;
- striking me bodily with a car;
- threatening to put a bullet between my eyes;
- attempting on more than 12 occasions to have me prosecuted on false criminal charges, including by the FBI;
- stealing a manuscript and artwork from my car;
- filing false sworn statements about me in various litigations;
- extracting and disseminating information from my supposedly confidential auditing files;
- illegally videotaping me;
- attempting to entrap me in the commission of a crime;

- threatening me on several occasions if I testified about my knowledge of Scientology;
- threatening my friends;
- subjecting me to a massive international "black propaganda" campaign.

Black propaganda or "black PR" is the term Hubbard gave to Scientology's policy and practice of destroying a target's reputation and credibility or public belief in him by the manufacture and spreading of falsehoods about him. Over the years Scientology has published and disseminated a small mountain of black PR on me, falsely accusing me of perversities and crimes, including crimes against humanity, in an ongoing effort to assassinate my character.

The first case Scientology filed against me went to trial before Los Angeles Superior Court Judge Paul G. Breckenridge, Jr. in 1984, resulting in a decision in my favor. Judge Breckenridge stated:

"In addition to violating and abusing its own members civil rights, the organization over the years with its "Fair Game" doctrine has harassed and abused those persons not in the Church whom it perceives as enemies. The organization clearly is schizophrenic and paranoid, and this bizarre combination seems to be a reflection of its founder LRH[ubbard]. The evidence portrays a man who has been virtually a pathological liar when it comes to his history, background and achievements. The writings and documents in evidence additionally reflect his egoism, greed, avarice, lust for power, and vindictiveness and aggressiveness against persons perceived by him to be disloyal or hostile."

Judge Breckenridge condemned as well Scientology's abuse of its participants' auditing or psychotherapy records:

"culling supposedly confidential "P.C. folders or files" to obtain information for purposes of intimidation and/or harassment is repugnant and outrageous." (LASC No. C 420153)

This decision was affirmed on appeal, *Scientology v. Armstrong* (1991), 232 Cal.App.3d 1060, 283 Cal. Rptr. 917.

Scientology also subjected my attorney Michael Flynn to fair game attacks, which included infiltrating his office, threatening his family, paying known criminals to testify falsely against him, suing him and his office some fifteen times, framing him with the forgery of a \$2,000,000 check, and targeting him with an international black PR campaign. (See, e.g., *U.S. v. Kattar*, 840 F.2d. 118). Flynn became desperate to have the attacks and threats end, and ultimately, due to that desperation, compromised his ethical responsibilities to his clients.

In December, 1986 Scientology and Flynn entered into an agreement to settle all his some twenty clients' claims against the organization, plus Flynn's own lawsuit seeking damages for the years of fair game. I was to settle my cross complaint for the years of abuse inside Scientology and the years of fair game after I left. Scientology and Flynn positioned me as a deal breaker, only showing me the "settlement agreement" they wanted me to sign after my arrival in Los Angeles from Boston, where I had been working in Flynn's office.

I protested that I could not sign the document, which

required that I be absolutely silent about my then 17 years of experiences with Scientology, and which contained a \$50,000.00 liquidated damages penalty for any utterance I might make to anyone. In response Flynn stated that the conditions were "not worth the paper they're printed on." He told me, "You can't contract away your Constitutional rights; "the conditions are unenforceable." When I argued that the settlement document opened me up to future problems with Scientology Flynn said, "I'll be there for you."

Flynn said that he was sick of the litigation, the threats to him and his family and wanted out, that Scientology had ruined his marriage, his wife's health and his life. He said that as a part of the settlement he and all co-counsels had agreed to not become involved in organization-related litigation in the future. He expressed a deep concern that the courts in this country cannot deal with Scientology and its lawyers and their contemptuous abuse of the justice system. He told me that if I didn't sign I could look forward to more years of fair game harassment and misery.

Flynn told me that the settlement's global form was to give Scientology the opportunity it sought to change its combative attitude and behavior by removing the threat he and his clients represented to it. He said Scientology had promised to cease fair game and that he and all his clients depended on my signing to have fair game against them cease. Because of Flynn's representations that the offensive conditions were not worth the paper they were printed on, and to have fair game end for Flynn, his family, his other clients and myself, I did sign Scientology's document.

Although I sought peace and did nothing to irritate Scientology, the organization had no intention of ending fair game attacks on me or anyone else. Immediately following the settlement Scientology delivered black PR documents about me to the Los Angeles Times. Over the next three years, and before I responded in any way, Scientology's attacks included:

- delivering black PR to various media representatives;
- publishing its own false and defamatory descriptions of my Scientology experiences;
- disseminating to the media an edited and defamatory version of the illegal videotape it had made of me;
- disseminating my own documents which had been sealed in my case;
- filing affidavits about me in a civil lawsuit in England which falsely charged that I had violated court orders and was an admitted agent provocateur of the US Government;
- threatening to sue me if I even talked to attorneys in the case in which the false charges were being made;
- threatening to expose a private writing if I did not assist Scientology's effort to prevent a third party litigant from accessing my LA Superior Court file;
- threatening to sue me if I testified even after being served with a deposition subpoena.

In the fall of 1989, after service of the deposition subpoena in the case of Bent Corydon v. Scientology, I received a series of telephone calls from Scientology attorney Lawrence Heller which were threatening and troubling. Heller threatened that I could be sued if I testified about my experiences, even though I had been subpoenaed, and that I should refuse to answer the deposition questions.

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As a result of Heller's threats and Scientology's other post-settlement fair game I concluded that the settlement agreement and the organization's efforts to enforce it were acting to obstruct justice, and that if I allowed myself to be intimidated by the threats I would be abetting that obstruction. I concluded that I could not avoid a confrontation with Scientology, and subsequently responded to defend myself and to try to correct the injustices created by the settlement agreement and its misuse.

From that time until the present many people who consider themselves victims of Scientology's abuse have contacted me to request my assistance in their efforts to obtain redress or defend themselves. I have come to believe that all people have a God-given right to assist their fellows, which cannot be taken away by human "contract." I have also come to see that a person's right to participate in a public controversy, certainly a controversy involving himself, should not and cannot be taken away by "contract."

In the case of Scientology v. Armstrong, Marin County Superior Court Case No. 157680, the organization was awarded by summary judgment \$300,000 in liquidated damages, \$320,000 in costs and a permanent injunction prohibiting me from discussing Scientology or Scientologists, or assisting in any way Scientology's victims or fair game targets. This judgment is suspect because, among other things, the judge completely ignored and refused to address the First Amendment religious issues and defense.

The judge ruled that Scientology may say whatever it wants about me, no matter how false, obnoxious or defamatory, and that I may not respond in any way to defend myself. To arrive at this conclusion he also ignored and refused to address a sworn declaration by Scientology attorney Heller that the organization, which had published false statements about me after the "settlement," was also bound by its non-disclosure conditions. Heller had filed this declaration in the Corydon litigation in an effort to prevent my deposition from going forward.

I had never agreed to be Scientology's defenseless punching bag. I believe that a judgment in a US court which orders that someone submit to being a punching bag, especially to a known abusive and dangerous organization like Scientology, is itself abusive and dangerous, and illegal. That Scientology should use the US courts to obtain such an order and unfair advantage is indicative of its antisocial goals and disregard for civil rights and basic equity.

Scientology's policy and practice of attacking and compromising judges presiding over its legal proceedings is well known. (See, e.g., The American Lawyer article, December 1980, "Scientology's War Against Judges.") This article, which focused on the criminal trial of 11 Scientology intelligence personnel in connection with their burglarizing of US Federal offices and theft of government documents, stated that Scientology's

"strategy amounts to an all-out war against the D.C. district court judges, a war much more sophisticated, better financed and more successful than the bizarre tactics used by some other groups against their courtroom adversaries, such as Synanon's attempt to murder an opposing counsel by putting a rattlesnake in

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his mailbox."

This all-out war continues to this day, and renders suspect every legal decision obtained by Scientology, including the tax exemption it obtained from the IRS in 1993.

After Scientology sued me following the "settlement" I learned from Michael Flynn that he had signed a "contract" with Scientology which prevents him from assisting me in my defense. His promise to be there for me was merely an inducement to get me to sign so that fair game toward him would end. Throughout the post-settlement litigation, Flynn, while admitting that his contract with Scientology is illegal and unenforceable, has refused my requests to come forward, stating that he fears again having his life ruined by more fair game. This too is indicative of the organization's continuing antisocial goals and rights abuses.

Early this year I was served with a subpoena for production of documents by Grady Ward in the case of Scientology v. Ward, USDC Northern District of California. Ward is accused of posting some of Scientology's "secret scriptures" to the internet. After receipt of the subpoena I received a letter from a Scientology attorney threatening me if I produced the requested documents. I therefore advised the presiding judge in the Ward case of the threat. Scientology was able to then obtain an order of contempt against me for communicating to the federal judge, sending me to jail and fining me.

Also early this year I discovered that in its 1991 IRS Form 1023 submission, pursuant to which it obtained its tax exemption, Scientology included a four page section about me containing the same black PR the organization spreads to the media and public. What Scientology wrote about me, in response to the IRS's questions concerning my Scientology-related litigation is factually and in conclusion false. Scientology submitted these false statements to the IRS during a time when it believed it had me silenced by its gag contract, and therefore unable to respond to correct the lies. I have asked Scientology to correct the lies submitted to the IRS and it has refused.

Scientology's IRS tax exemption is based on lies, not just about me, but about other individuals, and about the organization's practices and intentions. The IRS was derelict in its duty to investigate the truth or falsity of Scientology's submissions. The US was derelict in its duty in granting Scientology's tax exempt status, protecting it, and supporting it in its global goals. By aligning itself with Scientology the US turned its back on its citizens who have been victimized by the organization, and who are really the people the US should protect and support. When I realized that Scientology's leaders consider that their tax exempt billions depend on silencing me, and that the US courts and government had formed an unholy alliance with the organization, I left for Canada.

Scientology claims to be a religion, and claims all the extraordinary benefits conferred by the Constitution on religions. It claims that it is organized solely for religious purposes and that its policies and bulletins, even its intelligence training instructions and its "fair game" policy, are "scriptures." It claims that people and countries opposing its antisocial goals and practices and civil rights abuses are engaging in "religious persecution."

It is axiomatic that there is no freedom of religion where there is no freedom to criticize, oppose or reform religion. The US was founded in great part by people fleeing "religious persecution" for opposing, criticizing or seeking to reform a religion, which had the power, often provided by the State, to persecute them. The US recognized the need for its citizens to be free from religious persecution in the Religious Expression and Religious Establishment Clauses of the First Amendment.

The prohibition against the State's establishment of a religion has traditionally been interpreted to mean that no religion will be favored or given more support by government than any other religion. Christianity and Christians, Buddhism and Buddhists, and Scientology and Scientologists will be treated by government and all its branches in every way equally. Also anti-christians, anti-buddhists and anti-scientologists will be treated in every way equally.

Scientology, with its fair game attacks, black PR, gag contracts, and aggressive litigation, is attempting to suppress and eliminate criticism, as well as opposition and reformation efforts. The US courts' enforcement of its gag contracts necessarily involves the State in this one "religion's" suppression and elimination of criticism. Judicial enforcement also results in the promotion and establishment of Scientology by the removal of opposition to its promotion and establishment. Unless the State is also willing to become involved in and support every other religion's suppression or elimination of criticism, its judicial assistance to Scientology in its campaign is favoritism, and impermissible. It is a tragedy for all that the US favors the most abusive and irreligious of its "religions."

It is inconceivable that any US Court would prosecute someone who under any circumstances signed a contract which required that he not discuss God, Jesus Christ, the Holy Bible, or his experiences in the Christian religion; or for that matter Allah, Islam, Mohammed, the Koran, the Vedas or Krishna. It therefore must not do so at the insistence of Scientology. It is inconceivable that a Christian church in the US would do what Scientology has done to silence its critics. But even Christianity, although it would never silence anyone about itself, must not be given the opportunity. Therefore Scientology's efforts to silence its critics and prevent discussion of itself must not be given judicial support.

My case is not unique. There are hundreds, if not thousands, of Scientologists and ex-Scientologists in the US who are bound by this organization's contracts of silence. For this reason alone the statements of Scientology's spokespeople cannot and should not be believed. Those who would speak the truth have been shuddered by "contract" and threat into silence. I just happen to be one of the few who have chosen, despite the threats and attacks using the power of the US courts, to speak up. Mine is a test case for all the people Scientology binds in silence. What the US does in my case will spell either freedom or continued persecution for those many fearful silent people.

In the US, Constitutionally guaranteed Freedom of Religion has come to mean freedom for the religious corporation and its leaders to persecute the practitioners, as well as the critics, of the religion. This is a perversion of Freedom, worked by clever lawyers being paid by the persecutors. It must be changed,

and true Freedom of Religion reinstituted. The US is the only western country in which people can be jailed for mentioning a religion - Scientology. Certainly Germany does not jail people for mentioning any religion, or even Scientology.

Regarding Scientology, and any religion, at least these things must be ordered and implemented before it should be granted the benefits of religious status, and before the US champions its cause:

1. Any member of any religion must be free to leave at any time without persecution for choosing to leave, and may not be detained for any amount of time;
2. Any member of any religion must be free to speak or write freely his or her experiences within that religion, and may not be persecuted for doing so;
3. Scientology must take steps to demonstrably insure that the practice of using information divulged by people during their association with the organization against those people in any way not for their welfare is forever stopped;
4. Scientology must reform pursuant to civil rights statutes, or abolish, its RPFs.

Thank you for this opportunity. I pray that we do the right thing.

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SECRET LIVES "L RON HUBBARD"

TRANSCRIPT

HANA ELTRINGHAM: We were saving the world. We were convinced that Hubbard was the return saviour, and that his techniques and his knowledge and his majesty would eventually bring all Mankind to an enlightened state, and that was what we were doing.

There were some things about him that I did feel were rather dangerous. I fell so much under his spell that I told my roommate if I ever I told you I was going to marry this man, she should tie me up and not allow me out of the house.

CYRIL VOSPER: I was overwhelmed. Here I am in the presence of the most important individual in the cosmos. I mean, you know, this isn't just like meeting a film star or something, I'm meeting - I'm meeting god with plus signs.

NARRATOR: Lafayette Ron Hubbard created one of the richest and most controversial cults of our time, the Church of Scientology. He spent much of his later life at sea, on the run from those who accused him of being a crook and a charlatan. But to the millions who, at one time or another, followed him, and to himself, he was the greatest guru who ever lived.

RON HUBBARD There is one thing you can say about dianetics and scientology, and I'm sorry if this sounds odd, but it isn't everybody who can write a book that turns the world on its ear.

NARRATOR: But or remarkable still, was the story of Ron Hubbard's life, the story of a science fiction fantasist, turned self acclaimed messiah.

NARRATOR: Ron Hubbard was determined that from the start his life would be the stuff of legend. He was born in 1911, and told of how he was brought up on his grandfather's ranch in Montana, which he said in a newspaper interview covered a quarter of the state.

As a small child he was breaking broncos and hunting coyote.

He claimed he grew up with old frontiersmen and cowboys, and even became a blood brother of the local Blackfoot Indians. These were all splendid tales, but all that was known for use was more mundane. He did used to visit a small livery stables his grandfather owned, but he was brought up in an ordinary home, the only child of ordinary American parents.

Towards the end of World War I, his father joined the American navy, and the teenaged Hubbard spent holidays in Guam, where the family was stationed. He traveled in China.

With a taste for adventure, he went prospecting for gold in Puerto Rico. And as a student even led a sea exploration to find pirates haunts in the Caribbean.

But he couldn't resist gilding the lily. A scientology book

later recorded his claim to have communed with native bandits in the high hills of Tibet. But there is no evidence he ever went to Tibet.

CYRIL VOSPER: He told so many stories of exploits of his in South America and the West Indies and places, he would have had to have been at least 483 years older to have had enough time to have done all those things, but that doesn't really matter. I mean it was just very entertaining really, except that he turned it in to a religion

ROBERT VAUGHN YOUNG: Even when he was a teenager in his diaries, he was writing little stories, you know, sea adventures and years, that sometimes when some of his own representatives found them, they thought these were true. You know, there was an escapade of him fighting an octopus that once his - one of his personal representatives was telling as a true story, and I tried to point out to her later, no, this is just one of his stories that he's interspersing with his private diaries.

NARRATOR: When he was 22, Hubbard married his first wife, Polly. They went to live on Puget Sound in Washington State, and soon had two children. Hubbard's joy in life was sailing and exploring, but now he had to settle down and earn some money.

With such a prolific imagination he became a writer, starting with adventures and fantasies with the penny dreadfuls.

Then he turned to science fiction and became a best seller. Two books, Final Blackout and Fear, were considered sci-fi classics.

But Hubbard's most amazing story was about himself

His literary agent was Forry Ackerman, himself a sci-fi fanatic. One night, deep in to the small hours, Hubbard told Ackerman of a bizarre event in a hospital theatre. It was an event that would shape his entire life.

FORRY ACKERMAN: He said that he had died on the operating table, and he rose in spirit form, and he looked at the body that he had previously inhabited, and he slugged the shoulders he didn't have any more, and he thought, well, where do we go from here.

Off in the distance he saw a great ornate gate, and looked kind of interesting to him, so he walked over to it, and the gate, as they do in supernatural films, just opened without any human assistance. He floated through, and on the other side he saw an intellectual smorgasbord of everything that had ever puzzled the mind of man, you know, how did it all begin, what is god's purpose, where do it from here, are there past lives, are there future lives. And like a sponge he was just absorbing all of this esoteric information. And all of a sudden there was kind of a swishing in the air and he heard a voice, no, no, not yet, he's not ready, and like a long umbilical cord he felt himself being pulled back, back back. And he laid down in his body and he opened his eyes and he said to the nurse, I was dead, wasn't I?

Then he bounded off the operating table, I don't know how you die and the next minute you're bounding off an operating table. He got two reams of paper and a gallon of scalding black coffee, and at

the end of two days he had a manuscript called Excalibur or the Dark Sword. And he told me that whoever read it either went insane or committed suicide. And he said the last time he had shown it to a publisher in New York, he walked in to the office to find out what the reaction was, the publisher called for the reader, the reader came with the manuscript, threw it on the table and threw himself out of the skyscraper window.

NARRATOR: But was Hubbard's extraordinary story true?

Excalibur became the secret text of Scientology. Hubbard said it was too dangerous to publish.

But 40 years later, a treasure trove from Hubbard's early journals and manuscripts, believed to have been long lost, was discovered by his staff.

[GERRY ARMSTRONG: There were two and a half versions of Excalibur. I read them and I didn't go mad, and didn't die.

They also include the information within related writings that these came out of a nitro-oxide incident. Hubbard had a couple of teeth extracted and it was while under the effect of nitro-oxide that he came up with Excalibur.

NARRATOR: Hubbard's death was in fact an hallucination under the effects of anesthetic, so what was the intellectual dish he'd fed on?

[GERRY ARMSTRONG: it's not particularly revolutionary. The key to Excalibur was this great realization by Hubbard of survive as being the one command that all existence and all life and all people have that became the basis for a lot dianetics, and a lot of scientology.

NARRATOR: This idea had a profound impact on Hubbard. In a letter to Polly he wrote, I have high hopes of smashing my name in to history, so violently that it will take a legendary form.

The Second World War brought a new dimension to the Hubbard legend.

He said that while serving at sea he'd been blinded and crippled, but that inspired by the insights he'd first glimpsed when he died on the operating table, he'd dramatically been able to cure himself

RON HUBBARD: By 1948, through my own processing and use of the principles I had isolated up to that time, was able to pass a 100% combat physical, which was very mysterious to the government. How had I suddenly become completely physically well from being blind and lame.

NARRATOR: It was an odd story, because Hubbard's war record shows he was invalided out because of a stomach ulcer. There are earlier mentions of conjunctivitis, but none of blindness. Indeed, in 1947, before his so-called cure, an eye examination only showed some short-sightedness and a astigmatism and none of his Navy Medical reports show blindness.

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After the war, Hubbard went to Hollywood. As a successful science fiction author, he was a welcome visitor to the Los Angeles Science Fantasy Association.

Its members recall there was one power over the mind he undoubtedly did possess; hypnotism.

FORRY ACKERMAN: Ron Hubbard came to our club and he hypnotized all of the members except me, I wanted to remain in present time and watched what was going on. And I remember it was fascinating. He told one boy that he had a little kangaroo in the palm of his hands, and the boy was going all around showing everybody this little kangaroo that was hopping around.

NARRATOR:

Hubbard also dropped hints to his Hollywood friends about his new science of the mind. In writing and conversations Hubbard began to speak of his new science of the mind.

A scientologist literature would later depict, Hubbard claimed that in addition to himself, he'd cured 11 war veterans, and restored sanity to 40 mental patients.

JEAN COX: Rumours were beginning to circulate that this new science of mind, or this new philosophy had a significance for mankind that was greater than the discovery of the wheel, and equal in significance to the discovery of fire.

NARRATOR: In the May 1950 edition of Astounding science Fiction magazine, Hubbard published his stunning findings as fact.

Dianetics was truly born. Thousands of letters poured in to the magazine. Hubbard had been pounding the typewriter keys for 30 days, to convert his article in to a 450 page book. It became a best seller, dianetics a national craze.

Hubbard's theory was that the human mind was bedeviled by engrams, memories of painful events, often imprinted before birth on the foetus. He claimed that under the direction of a dianetics therapist, or auditor, as he called them, these engrams could be relived and then cleared from the mind.

At this stage dianetics seemed just an exaggerated form of psychotherapy.

FORRY ACKERMAN: Well, dianetics was so popular because it promised a brave new world of everybody cleared, no more colds, no more eye glasses, cured me of a fear of dogs.

JEAN COX: Among the various things said to be able to do, is one person had lost a tooth and through dianetic auditing he regrew the tooth. And almost any illness can be cured. Schizophrenia could be cured.

FORRY ACKERMAN: Seemed like it opened up the whole world for everybody to become perfect human beings.

NARRATOR: Hubbard sold dianetics auditing courses at \$500 a go. The money was rolling in, but he was about to be accused of being a

con man.

End part One.

NARRATOR: With his book, Dianetics, a bestseller, Hubbard was America's new guru.

In August 1950, at a lecture hall in Los Angeles, he presented to a crowd of 6,000, the first person to be what he called a clear.

She was a student called Sonia Bianca. As a clear she was supposed to have total recall.

JEANCOX: So various members of the audience called questions at her, could she remember what was said on page 217 of her physics textbook, she couldn't. Could she remember what she had had for her breakfast on the morning of August 17th 1946, she couldn't.

Then various people called out for Hubbard to turn his back on her, and see if she could remember the colour of his tie, she couldn't. And so that was - at that moment the whole business sort of collapsed, people started leaving the auditorium.

NARRATOR: Suddenly Hubbard was in trouble. He was accused of being a fraud, and dianetics a form of hypnotism. a technique at which he was so expert. He recruited a bright, young PR woman, Barbara Kaye, to repair his damaged image.

BARBARA KAYE: Well, I've always found that if it's the mind of a man that is most sexy. He was not really terribly physically attractive, and he had a brilliant mind, no question about that. And I surely thought this was a man who was interested in marrying me, and whom I might be interested in marrying.

NARRATOR: Soon, the beautiful young woman, and 40 year old Hubbard were having an affair, and moved in to an apartment in Hollywood. But, by now, Hubbard had left Polly and was married to his second wife Sarah. He'd led Barbara to believe the marriage with Sarah was over. It wasn't.

BARBARA KAYE: It was quite shocking when shortly after moving some of my things in to that apartment, suddenly Sarah turned up with the baby, and moved in. And I believe he was just as dismayed as I, because the next day when he came to the office with some of my belongings, like my cologne, and my toothbrush and so forth, he looked very downtrodden and apologetic, and not happy about the situation at all.

Dianetics was still in trouble. After the initial success of the book money had rolled in, and rolled out just as fast.

Hubbard went to Palm Springs to try to recoup his fortune with a follow up book, but the business, his marriage with Sarah, and his writing were in crisis. He asked Barbara to come to him.

BARBARA KAYE: He was certainly very depressed. He had lost the colour in his face, his voice was very - was hardly audible. He told me that he was totally blocked, he was working under a publisher's deadline, which he was failing to meet. He believed that his inability to write was due to the sinister interventions of

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other people, such as Sarah hypnotizing him in his sleep and telling him he will never write again.

I found him paranoid, you know. He was clearly going through clinical depression.

NARRATOR: Worst followed. Hubbard and Sarah finally split up. Their divorce became a public sensation. Sarah accused Hubbard of torturing her and declared him insane.

Hubbard denounced Sarah as a Russian spy and kidnapped their 13 month-old daughter.

Hubbard ended up in Wichita in Kansas, and got back in touch with Barbara.

BARBARA KAYE: He sent me a wire telling me he'd been very ill, and said he wanted to marry me, and when I went to Wichita he looked terrible. He had hair down to his shoulders and fingernails were like talons. And I found a note, very sweet note in my hotel room saying, glad you're here, I love you. But I saw that I had a man there who had no prospects for one thing, and that he had some psychiatric difficulties, and I didn't see much of a life for myself with that sort of individual, so I left.

NARRATOR: But Hubbard bounced back. He got married for the third time to one of his students, Mary-Sue Whipp. This marriage lasted, and Mary-Sue would become his devoted deputy. Sarah, his second wife, was cleared from his memory, just like an engram.

RON HUBBARD: How many times have I been married, I've been married twice. And I'm very happily married just now. I have a lovely wife, and I have four children. My first wife is dead.

INTERVIEWER: What happened to your second wife?

RON HUBBARD: I never had a second wife.

NARRATOR: In 1952 Hubbard launched a revolutionary product, Scientology. Dianetics originally covered this life only, but a new book, Scientology, the History of Man, Hubbard revealed that wasn't enough. Human bodies were, in fact, inhabited by immortal souls, or thetans, going back to primeval times.

The book stemmed from an unusual piece of drug driven research Hubbard had conducted with Nibbs, Hubbard's son from his first.

JIM DINCALCI: Ron Hubbard gave his son, Nibbs, some amphetamines, Nibbs started talking, he said, but really going talking fast, at speed. And he kept talking and he kept talking and his dad kept giving him speed, and all of it sudden he was talking about his history when he was a clam, and all these different situations in early earth, and out of that came History of Man.

FORRY ACKERMAN: Suddenly you're a nobody. Oh, I've been back three lives, you, know, I've been back seven, I was in the time of Pharaoh. Well, when it got back to the individual who was a clam, lying on a primordial seashore, with a grain of sand irritating a pearl inside it, I decided that was as far back as I wanted to go,

arid I just departed from Scientology altogether.

NARRATOR: In late 1952, Hubbard came to London. He was still in financial trouble back home. A business partner had just issued a warrant for the return of \$9,000 Hubbard had borrowed.

To make money he needed to go international, and here, instead of creditors, he found a new group of adoring fans.

PAM KEMP: He was really flamboyant. I mean he was - he was full of life. I mean you've read about on his Harley motorcycle, and he threw parties and he would play his guitar, and you know, just sing and put on his cowboy hat. He was just lots and lots of fun.

We'd all get together and then we would do various exercises and we'd go out and see if just with thoughts we could knock off policemen's hats or, you know, what kind of power did we have in terms thinking and thought and energy and that sort of thing. I mean it was great fun.

CYRIL VOSPER: I thought it would give me total control over my own life. I mean it sounds ridiculous, doesn't it, but I mean put in those terms that's basically what Hubbard was saying. He was saying that you and everyone else, with the use of Scientology or Dianetics at that time, could become a god. And we were all, if you like, fallen gods.

NARRATOR: The next step was to create a church for his new gods.

Back in 1946, Hubbard had told the Eastern Science Fiction Association, if you really want to make a million, the easiest way is to start a religion. That's where the money is.

Now, five years on, the Church of Scientology was born.

In America, in particular, there were sound practical reasons.

RAYMOND KEMP: There are tax advantages, and there are advantages in the constitution which says that the government may not abridge the operations of a church. And I think that that, more than anything else, made him agree to using that vehicle because it is, and has today proved, to be very difficult for any government to abridge, the activities of a church.

NARRATOR: Hubbard found the perfect cathedral for his church, Saint Hill manor, in East Grinstead in Sussex.

He played his new role, the country squire.

He told the locals that- he was a scientist researching plants, and their reaction to pain.

He, and his young family, settled in to Sussex society, bringing American razzmatazz to East Grinstead's road safety campaign.

But the locals hadn't realized that Saint Hill was to become the mecca of Scientology.

Debatees arrived from all over the world, to study at their master's feet.

They paid thousands of pounds for Hubbard's courses.

RON HUBBARD: The mind, when it has an old experience, will add data in to its current experience, and it keeps coming up with wrong answers.

NARRATOR: Virginia Downsborough was on the first Saint Hill clearing course.

VIRGINIA DOWNSBOROUGH: Ron had such an amazing ability for making you feel that you were just so important to him, and so so valued.

So many people wanted to do what he wanted. Wanted to show him their best efforts, wanted to contribute, and wanted to be part, you know. It was again, it's wait for me, let me come along with this wonderful game you're playing.

NARRATOR: Central to the game was Hubbard's E meter, form of lie detector which he claimed could electrically detect emotional charge.

Students spent hours, days, months, sometimes years, going over painful events, or engrams, in this or their past lives, trying to make the needle float, proof that the engram was now cleared from their memories.

SCIENTOLOGIST: It's like nothing else in the world it's - really, I feel quite free.

NARRATOR: Hubbard had designed an ingenious commercial product. The more past lives, the more memories, the more engrams to be cleared, all in the complex series of expensive courses.

HANA ELTRINGHAM: Making money, I think, to Hubbard was paramount. He wasn't that interested in it for at himself. He did have perks, he did have his cars, his motorbikes, his books, his good food, and things like that, and eventually he had his villas and he had his estates. and so on, but the money that he wanted, predominantly, was for power.

NARRATOR.: Hubbard wanted to create a worldwide army of scientologists.

Going clear was only the first step. After that, further courses could improve your IQ, improve your work, turn you into a Superman.

PAM KEMP: The purpose of scientology was to make the able more able, and he was always striving for that. And in everything he did I think he was looking at that. Now his idea was, that if you could get every single person looking in the same direction, then you have a very powerful notion.

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NARRATOR: This photograph, composed by Ron Hubbard himself, betrays an extraordinary ambition he held for scientology.

HANA ELTRINGHAM: The entire objective was to find a place that Hubbard could eventually turn into his own kingdom, with his own government, his own passports, his own monetary system. In other words, his own principality that he would be the benign dictator of. That was the objective.

RAY KEMP: He had been having some auditing and doing some investigative auditing and looking at past lives and at past experiences. And he ran in to what he thought might be the past life of Cecil Rhodes. So he went to Rhodesia to check out what he had discovered in his auditing.

HANA ELTRINGHAM: He was there to attempt to create a scientology community in the country, and eventually turn the country over in to a scientology country. He was looking for a Home base for scientology.

NARRATOR: Hubbard's vision of becoming a later day Rhodes failed. The Rhodesian government became suspicious and his visa was not renewed.

Back in England, Hubbard was also under attack. Parents were worried by strange communications from children who'd fallen under scientologists thrall.

SCIENTOLOGIST'S MOTHER: There was a letter from her saying that she was disconnecting from me. You probably are familiar with this, you've seen it in the paper.

INTERVIEWER: Yes, yes.

SCIENTOLOGISTS MOTHER: That I was destroying her, and that she didn't want to see me again. That's it, Karen... never signed it.

NARRATOR: The newspapers were accusing him of being a fraud, and lobbied the government to launch an inquiry.

Hubbard decided there was only one answer, he would take to the high seas.

With his loyal band of disciples, he would move himself and his empire outside any government's jurisdiction.

HANA ELTRINGHAM: At one point he turned around and said to us, in a very sort of masterful way, in a very, almost ambassadorial sort of way, he said, it's perfectly all right to step outside the law, because the law itself is aberrated, so in order to achieve our ends, that gives us license to step outside the law.

NARRATOR: Hubbard's followers were about to see the consequences of life beyond the law, as their messiah became their dictator.

END OF PART TWO

PART THREE

NARRATOR: In 1967, with his own navy of scientologists, the Sea

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Organization, Ron Hubbard set sail.

Hanna Eltringham, then 24, went with him. She'd never crewed on a large ship before, but Hubbard detected that she was unusually well equipped for naval command.

HANA ELTRINGHAM: Hubbard called me in to his cabin and stood right in the doorway of his cabin, fiddling with the E meter, and started asking me questions about when I had last been a captain. Well, this could only be past life, because I'd never been a captain in this life. So I started, you know, thinking back, and came up with this past experience about being a space captain of a space ship, and being blown up in space, and the planet was being invaded, and all these - all this fighting and blasting going on, and so forth. And at the end of it he peered over the E meter at me and he said, were you one of the loyal officers? And at that point I got this uprush and I felt good, I must have been one of those loyal officers, I must have been one of the elite, you know.

NARRATOR: The young Hana was appointed captain of Hubbard's number two ship, a 400 ton trawler.

His flagship was a 3,000 ton converted cattle ferry. On board, Hubbard had a personal guard, called the Commodore Messengers.

GERRY ARMSTRONG: They took care of everything for him. They dressed him. They got him ready for bed, they lit his cigarettes. they held his ashtray.

MIKE GOLDSTEIN: Most of the messengers were young girls, 13, 14, 15. They were an extension of his communication, so when somebody saw them on the ship or they came up to them, it was like you were talking to him.

NARRATOR: On one occasion, Gerry Armstrong, who'd been sent on a shore errand, was visited by one of Hubbard's messengers.

GERRY ARMSTRONG: This was Terri, who was later to be my wife, and she came to me where I was working and she said the Commodore wants to know, is it true that you went to the US Embassy and applied for 30 some odd visas, and I said yes, Sir, because that's how you respond to the messenger. And her next message was, the Commodore says you're a fucking asshole.

NARRATOR: The attacks on Scientology had pitched Hubbard into one of his periodic depressions.

His response was to take it out on his followers on sea and land. He designed a new disciplinary code called ethics, which put many of them into what he called lower conditions of existence, like liability, doubt or treason.

To rise out of these conditions penances were required. Liability, for example, required you to deliver an effective blow to Scientology's enemies.

VIRGINIA DOWNSBOROUGH: Everybody was supposedly in these lower conditions which is quite astonishing because everybody really loved Ron and wanted to contribute to having whatever his dreams might be come true.

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PAM KEMP: What happened was it became a very heavy, almost military, organization. People changed. I think people became scared. They were scared of ethics, scared of what would happen, and so they became, I think, very intimidated.

NARRATOR: At sea, the cruelty extended to children. On one occasion Hubbard was infuriated by a small boy who had unwittingly chewed a telex.

HANA ELTRINGHAM: He put this four and a half year old little boy, Derek Green, into the chain locker for two days, two days and two nights. Its a closed metal container, its wet, its full of water and seaweed, it smells bad. But Derek was sitting up on the chain, in this place on his own, in the dark, for two days and two nights. He was not allowed to go to the potty. I mean he had to go in the chain locker on his own, soil himself. He was given food. I never went near it, the chain locker, while he was in there, but people heard him crying. That is sheer, total brutality. That is - that's child abuse.

GERRY ARMSTRONG: People were in awe of him, and people were frightened of him. He was the boss, he was the dictator. He could order anyone to do anything on board. He was ruthless, he could be, at times, charming, but he could also be very belligerent, and he could also be very uncaring and cruel.

Yet Hubbard's disciples continued to believe in him. In 1968 he took a select few around the Mediterranean on his yacht, the Enchanter, on a project he called the Mission into Time. The task was to find treasure Hubbard had buried during his previous lives.

HANA ELTRINGHAM: We were in a tizzy, you know, all this excitement of this upcoming very important mission. And I was amongst one of the chosen, and we sailed off with our metal detectors, and went to a variety of locations, and did find some metal at the basement of what he claimed it used to be a temple in which he had liaisons with some priestess during his trips to Sardinia. There was metal buried down below. And he was very triumphant during those times. It was very heady stuff for us people. It had a very magical magnetic hypnotising effect on the followers.

NARRATOR: Hubbard was also engaged on further great expansion of Scientology. Once a Scientologist reached the state of clear, it became an operating thetan, or OT.

As always in scientology, each OT level could only be reached after an expensive course.

Did Hubbard believe it, or was he having his followers on?

CYRIL VOSPER: He probably always knew he was running a con, you know, he must have known that much of the stuff he was talking about was a load of rubbish. But I think after a while, when he found there were thousands were of people in adulation around the planet for this man, I think that started to take him over. I think he began to believe that he was, if not god, then very close to god.

NARRATOR: Hubbard's new cosmology was accompanied by new forms

of punishment on board ship. Crew members who displeased him were liable to be thrown overboard before being retrieved in the harbor below. If they reoffended, they were tied up and blindfolded first.

HANA ELTRINGHAM: I saw one woman, Julia Lewis Selman, from the United States, thrown overboard. This woman must have been in her 50s. She was - had her hands and I think her feet tied, maybe only her hands tied and a blindfold, but she went over. She was so panicked at the thought of being thrown over this way, she was standing on the edge of deck, panicked, beside herself, shouting. And I was standing on the A deck with Hubbard and his other aides watching this going on, and Julia didn't jump over, she had to be pushed over, because she was incapable, she was in such a fit.

JIM DINCALCI: He saw everyone suspiciously and assumed everyone was intentionally attacking him. Governments were attacking him, and then everyone around who made a mistake, they also were attacking him. And the only thing he could do would be to attack back.

NARRATOR: In 1953 a French court started proceedings against Hubbard for fraud. He had left his ship which was berthed in Morocco, and went to live in hiding in New York, where he was looked after by Jim Dincalci.

To turn the tables on his enemies, he devised a bizarre plan called Snow White. Its stated aim was for scientology members to infiltrate government departments.

Hubbard even issued his agents a reading list to learn the black arts of espionage.

ROBERT VAUGHN YOUNG: He believed that there was an international cabal that was in control of the attack on him around the world, as well as the attacks on the various countries. And so Snow White was written to find the cabal, find all the connections between all these enemy groups, to expose him to destroy them. It was done through infiltration, sometimes it was done through burglary. It was just pure military intelligence.

NARRATOR: Having instigated Snow White, Hubbard rejoined his ship in the Canary Islands. There he had a serious motorbike accident, his mood dramatically worsened.

HANA ELTRINGHAM: This was his period which I call the pouting, the crying, the mad period where he would cry and throw things against the wall, the bulkheads and pout and scream. But right towards the tail end of that he created the RPF, the Rehabilitation Project Force.

NARRATOR The RPF was yet another correctional regime. Its orders were fiercesome.

As ship's captain, it was Hana Eltringham's job to implement them.

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HANA ELTRINGHAM: I was absolutely horrified when I read them, because they talked about the creation of this, pretty much like a slave labour camp. Those weren't the words used, but that was the impression given, where two unwanted, those found wanting,

seriously wanting were sent, and they were to be kept in this with no rights, no freedoms, no privileges of any kind, pretty much the basic rights they were allowed were a little bit of sleep each day, food left overs, the harshest treatment. They were not allowed to speak to any of the crew. It was very, very, very bad that this was going on. But Hubbard's statement to us was that it's going to take a lot more ethics and a lot more punishment than anyone has - can easily face up to to get this whole world back in shape. And at that point I believed that statement.

JIM DINCALCI: Human emotionary actions is the way humans were, and he didn't specially regard humans very highly. He liked the idea that doll bodies that were in other civilisations. Doll bodies didn't have human emotions and reactions. They were, I guess, like Spock, you know, just very analytical, or you just get the job done, no emotions there, love is not a sentiment that's known or cared for, so.. And that's, to me, the tragedy, because he put that, I feel, in to the organisation, in to the way of being in the organisation.

NARRATOR: Hubbard even consigned his own son, Quentin, who was a senior auditor on the ship to the RPF.

MIKE GOLDSTEIN: Quentin really was a real sweet kid. He was a real nice guy and very soft spoken. And it was very difficult for him, being Hubbard's son, and being put on - in this very high position, and I don't think he was that interested in it, he just wanted to be a pilot, and also the fact that he was gay, and that's a very tough thing in scientology to be gay. Because, especially that kid, to be Hubbard's son, and to be this top technical person, and be gay, oh, that would be a horrible thing to be wrestling with and suppressing all the time.

NARRATOR: Quentin was sentenced to the RPF after he committed the sin of trying to commit suicide. Two years later he succeeded.

JIM DINCALCI: Hubbard saw it as a betrayal because everything was referenced around him. The world was doing everything to him. This technology that was supposed to work didn't even work on the senior person of all technology, you know, Hubbard and his son. No, he just saw that as an attack from his son, and that's....You know the love was gone. He didn't - was not a - he had lost love.

NARRATOR: In 1975, Hubbard decided it was time to come ashore. He sent scouts to look for a suitable landbase. They settled on Clearwater in the rich state of Florida.

HANA ELTRINGHAM: He stated, coming ashore would be profitable, because we could get so many more people to the Flagland base, as it was to be called for auditing and training. And he also wanted to concentrate on getting professionals to the land base, because, of course, they had more accessible money. They had pension funds, they had children education funds, and some of these he named, that were accessible.

NARRATOR: Hubbard knew scientology would be welcome, so he devised a top secret battleplan. He called it Operation Goldmine. Using a cover name, the United Churches of Florida, Hubbard issued secret orders to take over the town.

GABRIEL CAZARES: These orders, in effect, very clearly stated,

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move in to this area, find out who your friends are, develop them, find out who your enemies are, destroy them, and then move in to every possible area of community life, business, social, religious, education.

NARRATOR: The plan worked.

Clearwater is a scientology bastion.

Scientology owns 22 prime sites.

Big name scientologists like Lisa-Marie Presley have moved in.

MIKE GOLDSTEIN: You could get all the big big rollers, you get the people with the dollars, and you can make a fortune. And I believe the income for a week, this was like in 1978, '79, was somewhere at sort of half a million a week. I mean that's where the big bucks started to be made, when you could do that.

NARRATOR: With the money rolling in Hubbard moved to California, where he'd play his last great role.

His ambition was to film sci-fi blockbusters based on his books. They ended up as Scientology training films.

JIM DINCALCI: The movie mogul, Cecil B DeMille, you know, it was like he was, he tried to be bigger than life, but he just wasn't. So he would make these extravagant sets, they were ludicrous. They were not big productions, they were just silliness. They were an ego maniac. He tried be flustery and big and powerful, but if you look - just stepped and observed, you could see that he had fear about everything. And finally the fear came down to dust particles, little teeny dust particles.

GERRY ARMSTRONG: He had phobias about dust, he had phobias about dust smells. He had phobias about sounds, as though he would hear sounds that weren't there, and he would scream at the sound technician. And he would see things that weren't there, and he would scream at the people who were framing the shot. And he would smell smells that weren't there, and he'd have people rinse his clothing some 13 or 15 or however many times.

NARRATOR: In 1977, while Hubbard was away making movies, the FBI caught up with the Snow White operation scientology headquarters in Los Angeles and Washington.

Hubbard's wife, Mary-Sue, and eight other scientology executives took the wrap, and was sent to prison for conspiracy and stealing government documents. Hubbard disappeared, never to be seen again.

After living in a succession of hiding places, he ended up on this secluded ranch in the California Hills. 69

Secrecy has veiled his final years. But one man, Robert Vaughn Young, who was then a scientology public relations officer, was later given a description of Hubbard by one of his guardians. This, and evidence from Hubbard's autopsy report paint a sad picture. L

ROBERT VAUGHN YOUNG: He had grown a beard, he had grown his

long hair. The nails were long, very much the same problem as they found with Howard Hughes, unkempt nails. Neighbours, there was a neighbour that walked in on him one day, and he had become very frightened, and suddenly scurried out of the barn. He was frightened to meet people. He was terrified of meeting any new people. He was disappearing down, down, down in to this little strange world of his, that he had created. And the irony of this is this is a man that was promulgating and telling the world that my technology and ideas you can get bigger and bigger and bigger and yet he was shrinking down until finally he was hiding.

NARRATOR: On January 24th 1986, Ron Hubbard died.

The Church of Scientology said he'd simply quit his body to continue his work elsewhere.

ROBERT VAUGHN YOUNG: Him dying suddenly made him very mortal, and the last thing we could have is to have Hubbard be mortal. So a story had to be designed, and the story is that he went off to research the next level. And what's amazing i bought this, without bought it.

NARRATOR: Today, the L Ron Hubbard image is carefully protected by the Church of Scientology.

It says he is the greatest humanitarian in history.

Hollywood has named a street estimated \$80 million roll every year.

It continues to preach ti teachings can cure the met world.

The personal tragedy is, one mind scientology did not appear to help was that of its founder.

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Berliner Zeitung



Montag, 27. Oktober 1997 1 DM Berlin und Brandenburg - 1,50 DM Auswärts

Scientology demonstriert in Berliner Innenstadt

BERLIN: Scientology will heute in der Berliner City demonstrieren. Innenminister Jörg Schönbohm hat dazu aufgerufen, die Veranstaltung, zu der bis zu 10 000 Anhänger angekündigt sind, nicht durch Gegen-demonstrationen aufzuwerten. (po)

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SPECTRUM

Organisation der Scientologen unter Druck

VON LIANE V. BILLERBECK

Das Interesse der Medien ist enorm. Mehr als 20 Fernsehteams aus aller Welt werden heute in Berlin erwartet, um die Demonstration von Anhängern der Scientology-Organisation gegen „religiöse Diskriminierung“ zu dokumentieren. Mit rund 10 000 Demonstranten rechnet der Veranstalter, eine in den USA gegründete Gruppe „Freiheit für Religionen in Deutschland“ (FRG), die als Tarnorganisation des Psycho-Kults gilt. Sektenexperten mahnten zur Gelassenheit und wiesen die Scientology-Vorwürfe zurück. Renate Rennbach, die sektenpolitische Sprecherin der SPD, nannte die Demonstration eine „Frechheit“, da Scientology keine Religion sei, sondern es eindeutig auf Gelderwerb abgesehen habe.

Hintergrund der Demonstration ist der wachsende politische Druck, unter den Scientology nicht nur in Deutschland, sondern in ganz Europa geraten ist. Seit Anfang der 90er Jahre hatten immer neue Enthüllungen über gesellschaftliche Unterwanderungsstrategien des Psycho-Konzerns Politiker fast aller Parteien in Deutschland alarmiert. Die Innenministerkonferenz bezeichnete Scientology im März 1994 als Organisation, die „unter dem Deckmantel einer Religionsgemeinschaft Elemente der Wirtschaftskriminalität und des Psychoterror vereint“. Eine Studie im Auftrag der nordrhein-westfälischen Landesregierung bescheinigte der Organisation 1995 „neuartigen politischen Extremismus“. Am 6. Juni 1997 beauftragten die Innenminister den Verfassungsschutz, Scientology bundesweit zu beobachten.

Infamer Vorwurf

Auch anderswo in Europa wurde es für die Scientologen eng. In Frankreich, Belgien und den Niederlanden befaßten sich parlamentarische Kommissionen mit der Sekte. In Spanien und Griechenland ermittelten die Staatsanwaltschaften gegen führende Scientology-Mitglieder. In Frankreich wurden Scientologen wegen fahrlässiger Tötung verurteilt. Zugleich hat Scientology seit 1993 eine beispiellose Propagandakampagne gegen die Bundesrepublik ent-

fesselt. Aus Deutschland, dem wichtigsten Stützpunkt außerhalb der USA, fließen nach Schätzungen immerhin ein Drittel der weltweiten Einnahmen. In ganzseitigen Anzeigen wurde gebetsmühlenartig der Vorwurf wiederholt, Scientology werde in Deutschland verfolgt wie die Juden unter Hitler. Im Februar 1997 wiederholten 34 prominente Hollywoodstars, darunter Oliver Stone und Dustin Hoffman, in einem „Offenen Brief“ an Bundeskanzler Helmut Kohl diesen „infamen Vorwurf“, so Michel Friedman vom Zentralrat der Juden.

Die Kampagne gegen angebliche „religiöse Diskriminierung“ begann kurz bevor Scientology von der obersten amerikanischen Steuerbehörde IRS unter dubiosen Umständen als Religion bezeichnet und damit von allen Abgaben befreit wurde. Bis dahin galt Scientology auch in den Vereinigten Staaten als eine gefährliche Organisation; das Time Magazine sprach von einem „Kult der Gier“. Kurz nach der Entscheidung der Steuerbehörde gelang es Scientology erstmals im Menschenrechtsbericht des US-Außenministeriums von 1995 als verfolgt bezeichnet zu werden; später auch in Berichten der KSZE und der UNO.

Sekteneigene Straflager

Doch trotz des außenpolitischen Drucks blieb die deutsche Bundesregierung bei ihrer Position, den Psycho-Kult nicht außer acht zu lassen. Der Bundestag installierte eine Enquetekommission über „Sekten und sog. Psychogruppen“, die 1998 ihren Abschlußbericht vorlegen wird. Die Scientology-Expertin Ursula Caberta aus Hamburg betreut derzeit mehr Aussteiger als je zuvor. „Denen laufen die Leute in Scharen davon“, sagt sie.

In Berlin ist zur Zeit der amerikanische Ex-Scientologe Gerry Armstrong zu Gast, einst Mitarbeiter und Biograph von Sekten-Gründer L. Ron Hubbard. In den zwölf Jahren bei Scientology wurde er mehrfach in der sogenannten „Rehabilitation Projekt Force“ eingesperrt, dem sekteneigenen Straflager. Seit seiner Flucht aus Scientology wird er von der „religiösen“ Organisation gnadenlos verfolgt und bespitzt. „Die Demonstration soll vor allem die Amerikaner beeindrucken“, sagte Armstrong der Berliner Zeitung. Er bezeichnet die Scientology-Führung als „zynisch und gefährlich“. Armstrongs Anwesenheit in Berlin dürfte der Sekte ausgesprochen unangelegen kommen. Der außergewöhnliche Termin der Demonstration um die Mittagszeit deutet darauf hin, daß Scientology unbedingt in die prime time der US-Nachrichtensendungen kommen will. Morgen wird vor dem Bundesverwaltungsgericht über den Entzug der Vereinsfähigkeit gegen eine Sekten-Filiale verhandelt. Offenbar hofft Scientology die Obersten Richter zu beeindrucken.

Berliner Zeitung Nummer 250 - Montag, 27. Oktober 1997 - Seite 19

Berliner Zeitung

Berlin

Falsche Demo-Absage: Sekte will klagen

*Scientologen verdächtigen
Verfassungsschutz als Autor*

Die Scientologen werden heute in Berlin demonstrieren. Eine am Wochenende verbreitete Meldung, die Demonstration sei abgesagt, war falsch. Die Fälschung sehe die Organisation im Zusammenhang „mit der systematischen Boykott- und Diskriminierungspolitik von Innenminister Schönbohm“, sagte Scientology-Sprecher Georg Stoffel. Solche Praktiken seien aus dem „Repertoire der schmutzigen Tricks aus Verfassungsschutzkreisen nicht unbekannt“. Man wolle Strafanzeige erstatten.

Thomas Raabe, Sprecher der Innenverwaltung, nannte die Vorwürfe „abstrus und abenteuerlich“. Wer so etwas behäufte, müsse es auch belegen können; ansonsten habe er sich öffentlich zu entschuldigen. Die Verwaltung werde rechtliche Konsequenzen prüfen. Innensenator Jörg Schönbohm sehe die Demonstration mit Gelassenheit. Er hoffe, daß es nicht durch Gegendemonstrationen zu einer Aufwertung der Sekte komme. Aktionen gegen

den Aufmarsch der Scientologen sind bei der Polizei nicht angemeldet worden. (tom.)

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TAZ BERLIN 24.10.97

SCIENTOLOGISTS IN STEGLITZ INTERNATIONAL
(BIG PICTURE OF THE HOTEL)

AFTER THE DENIAL OF THE HOTEL KEMPINSKI THE SCIENTOLOGY CONFERENCE FOR "RELIGIOUS FREEDOM" ON THE 28 OCT SHOULD TAKE PLACE IN THE HOTEL STEGLITZ INTERNATIONAL AT THE STEGLITZER KREISEL. THIS CONFIRMED THE MANAGER OF THE HOTEL, KLAUS STOLLE. A RENT CONTRACT HAS NOT BEEN SIGNED YET.

TOWARDS THE TAZ, STOLLE EXPLAINS THAT HE WANTS TO DO THE EVENT ALREADY ALONE FOR ECONOMIC REASONS, WHERE AROUND 400 SCIENTOLOGISTS ATTEND IN A SORT OF TRIBUNAL REPORT ABOUT THE "DISCRIMINATION" IN GERMANY.

"EVENTUALLY AT THE END OF THE MONTH, I HAVE TO PAY THE FEES TO MY EMPLOYEES" SAID STOLLE. ALSO AS A CO-MEMBER OF THE INTERCONTI, STOLLE EXPLAINED FURTHER, HE ONCE IN THE PAST REJECTED THE ATTEMPT OF THE THEN CHAIRMAN OF THE JEWISH COMMUNITY, HEINZ GALINSKI, TO CANCEL AN EVENT OF A RIGHT GROUP.

IN THE MEANTIME THE DEMO ROUTE OF THE SCIENTOLOGISTS ON THE 27 OCT CHANGED THE SECOND TIME. THE BEGINN IS AT 13:30 AT THE GEDACHTNISKIRCHE. AT 16:00 THERE SHOULD BE A CONCERT AT THE BRANDENBURG TOR.

INSTEAD OF A COUNTER-DEMO THE SCIENTOLOGY CRITICS INVITE ON SUNDAY NIGHT TO AN EVENT AT 19:00 AT THE HAUS DER KIRCHE, AT THE GOETTESTREET. PARTICIPATING ARE SPD MEMBER RENATED RENNEBACH, THE SCIENTOLOGY DROP OUT GERRY ARMSTRONG AND THE TENANTS COUNCIL URSEL DYKHOF HOPES THE HAMBURGER SECT COMMISSIONER URSULA CABERTA.

BERLINER ZEITUNG: 27. OCT 1997:

TITLE: SCIENTOLOGY DEMONSTRATES IN THE BERLIN INNER-CITY.

BERLIN: SCIENTOLOGY WANTS TO DEMONSTRATE IN THE BERLIN INNER-CITY. SENATOR OF INTERIOR JOERG SCHONBOHM HAS CALLED NOT TO UPGRADE THE EVENT WITH COUNTER DEMOS TO WHICH THE ORGANIZERS HAD ANNOUNCED UP TO 10,000 PARTICIPANTS.

PAGE 4

SPECTRUM

TITLE: ORGANIZATION OF SCIENTOLOGISTS UNDER PRESSURE

THE INTEREST OF THE MEDIA IS ENORMOUS. MORE THEN 20 TV TEAMS FROM ALL OVER THE WORLD ARE EXPECTED TODAY IN BERLIN, IN ORDER TO DOCUMENT THE DEMONSTRATION OF ADHERENTS OF THE SCIENTOLOGY ORGANIZATION AGAINST "RELIGIOUS DISCRIMINATION". THE ORGANIZER COUNTS WITH AROUND 10,000 DEMONSTRATORS, ONE IN THE US FOUNDED GROUP "FREEDOM FOR RELIGION IN GERMANY" (FRG), WHICH COUNTS AS A DISGUISED ORGANIZATION OF THE PSYCHO CULT. SECT EXPERTS WARN TO CALMNESS AND REJECTED THE SCIENTOLOGY REPROACHES. RENATE RENNEBACH, THE SECT POLITICAL SPEAKER OF THE SPD CALLS THE DEMONSTRATION AN "IMPUDENCE", AS IT IS NOT A RELIGION, BUT IS CLEARLY AIMED AT MONEY AQUISITION.

BACKGROUND OF THE DEMONSTRATION IS THE GROWING POLITICAL PRESSURE, UNDER WHICH SCIENTOLOGY HAS COME NOT ONLY IN GERMANY, BUT THE WHOLE OF EUROPE. SINCE THE BEGINNING OF THE 90'S, MORE AND MORE REVELATIONS ABOUT THE SOCIETY INFILTRATION STRATEGIES OF THE PSYCHO CULT CONCERN POLITICIANS OF ALL PARTIES IN GERMANY WHO ARE ALARMED.

THE CONFERENCE OF MINISTERS OF INTERIOR CALLED SCIENTOLOGY IN MARCH

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1994, AN ORGANIZATION WHICH IS UNIFYING, UNDER THE CLOAK OF DISGUISE OF A RELIGIOUS COMMUNITY, ELEMENTS OF ECONOMIC CRIMINALITY AND PSYCHO TERROR. AN EXPERTISE ON ORDER OF THE NORDRHEIN-WESTFALIA STATE GOVERNMENT CERTIFIES THE ORGANIZATION IN 1995 AS A "NEW TYPE OF POLITICAL EXTREMISM". ON 6 JUNE 1997 THE MINISTERS OF INTERIOR ORDERED THE OPC TO OBSERVE SCIENTOLOGY FEDERAL WIDE.

INFAMOUS REPROACH

ALSO ELSEWHERE IN EUROPE IT IS GETTING TIGHT FOR THE SCIENTOLOGISTS. IN FRANCE, BELGIUM AND THE NETHERLANDS, PARLIAMENTARY COMMISSIONS WERE DEALING WITH THE SECT. IN SPAIN AND GREECE THE STATE ATTORNEYSHIP IS INVESTIGATING AGAINST FORMER SCIENTOLOGY MEMBERS. IN FRANCE, SCIENTOLOGISTS WERE CONDEMNED BECAUSE OF CARELESS HOMICIDE. AT THE SAME TIME IN 1993, AN UNPARALLELED PROPAGANDA CAMPAIGN AGAINST THE FEDERAL REPUBLIC WAS UNLEASHED. FROM GERMANY THE MOST IMPORTANT BASE OUTSIDE THE US, FLOW PER ESTIMATIONS AFTER ALL 1/3RD OF THE WORLDWIDE INCOME. IN WHOLE PAGE ADS THE REPROACH WAS REPEATED CONTINUALLY. SCIENTOLOGY IS BEING PERSECUTED IN GERMANY AS THE JEWS UNDER HITLER. IN FEBRUARY 1997, 34 PROMINENT HOLYWOOD STARS, UNDER IT OLIVER STONE AND DUSTIN HOFFMAN, REPEATED IN AN "OPEN LETTER" TO CHANCELLOR HELMUT KOHL THIS "INFAMOUS REPROACH", PER MICHEL FRIEDMANN OF THE CENTRAL COUNCIL OF JEWS.

THE CAMPAIGN AGAINST ALLEGED "RELIGIOUS DISCRIMINATION" STARTED SHORTLY BEFORE SCIENTOLOGY WAS RECOGNIZED AS A RELIGION BY THE HIGHEST AMERICAN TAX OFFICE (THE IRS) UNDER DUBIOUS CIRCUMSTANCE AND WITH IT FREED OF ALL TAXES. UNTIL THAT TIME THE ORGANIZATION WAS CONSIDERED AS A DANGEROUS ORGANIZATION; THE TIME MAGAZINE SPOKE OF A "CULT OF GREED". SHORTLY AFTER THE DECISION OF THE TAX OFFICE, SCIENTOLOGY MANAGED TO GET FOR THE FIRST TIME INTO THE HUMAN RIGHTS REPORTS OF THE US STATE DEPARTMENT OF 1995 AND WAS DESCRIBED AS BEING PERSECUTED; LATER ALSO THE REPORTS OF CSZE AND THE UN.

SECTOWN PUNISHMENT CAMPS

DESPITE THE FOREIGN AFFAIRS POLITICAL PRESSURE, THE GERMAN FEDERAL GOVERNMENT KEEPS THEIR POSITION, TO NOT LET THE PSYCHO CULT GO UNOBSERVED. THE BUNDESTAG INSTALLED A ENQUETTE COMMISSION FOR "SECT AND SO-CALLED PSYCHOGROUPS" WHICH IN 1998 WILL COME WITH UP WITH A REPORT. THE SCIENTOLOGY EXPERT URSULA CABERTA FROM HAMBURG CURRENTLY CARES FOR MORE DROP OUTS THEN EVER BEFORE. "MASSES OF PEOPLE ARE RUNNING AWAY FROM THEM", SHE SAID.

IN BERLIN IS CURRENTLY THE AMERICAN EX-SCIENTOLOGIST GERRY ARMSTRONG AS GUEST; ONCE STAFF MEMBER AND BIOGRAPHER OF SECT FOUNDER L. RON HUBBARD. IN 12 YEARS IN WHICH HE WAS IN SCIENTOLOGY HE WAS SEVERAL TIMES LOCKED IN IN THE SO CALLED "REHABILITATION PROJECT FORCE", THE SECT'S OWN PUNISHMENT CAMP. AFTER HIS ESCAPE FROM SCIENTOLOGY, HE IS BEING PURSUED MERCILESSLY BY THE "RELIGIOUS" ORGANIZATION AND IS BEING SPIED UPON. "THE DEMONSTRATION IS ESPECIALLY TO IMPRESS THE AMERICANS" SAID ARMSTRONG TO THE BERLINER ZEITUNG. HE CALLS THE SCIENTOLOGY LEADERSHIP AS "CYNICAL AND DANGEROUS". THE PRESENCE OF ARMSTRONG IN BERLIN SHOULD CREATE UNCOMFORTABLENESS TO THE SECT. THE UNUSUAL DATE OF THE DEMONSTRATION TO THE MIDDAY TIME POINTS TO IT THAT THE SCIENTOLOGISTS WANT ABSOLUTELY TO COME INTO THE PRIME TIME THE US NEWS.

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TOMORROW IN FRONT OF THE FEDERAL ADMIN COURT, THE CANCELLATION OF THE LEGAL CAPACITY OF A SECT BRANCH IS BEING DEALT WITH. OBVIOUSLY SCIENTOLOGY HOPES TO IMPRESS THE HIGHEST JUDGES.

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Weniger Demonstranten als erwartet

Scientologen protestierten in Berlin / Ex-Funktionär schildert Verfolgung Abtrünniger

Scientology-Anhänger aus Europa und den USA haben am Montag in Berlin gegen angebliche „religiöse Diskriminierung“ demonstriert. Ein ehemaliges Führungsmittelglied erhob in Hamburg schwere Vorwürfe gegen die Scientologen und die Regierung der Vereinigten Staaten.

BERLIN, 27. Oktober (zba/rtr/afp). Eine in Washington ansässige Gruppe „Freiheit für Religionen in Deutschland“ (Freedom for religions in Germany) hatte zu der Demonstration aufgerufen. Sie behauptet, „Rechte religiöser Minderheiten in Deutschland schützen“ zu wollen. Die Teilnehmer der Demonstration warfen Deutschland vor, die Scientology-Organisation zu verfolgen und zu diskriminieren.

Erst gut zweihundert Menschen angemeldet. Die Zahl der Scientology-Anhänger in Deutschland wird auf bis zu 30 000 geschätzt.

Auf dem Platz nahe dem Bahnhof Zoo schwenkten die Demonstranten Landesfahnen. Demonstrationen wurden eingeübt: „Freedom now“ (Freiheit jetzt) oder „Keine Diskriminierung durch die Regierung“. Plakate und Spruchbänder sollten Deutschland in die Nähe der NS-Zeit rücken: „Deutschland verletzt die Menschenrechte“, 1937 – 1997. Nichts hat sich verändert“, „Stoppt den Religionsfaschismus“, „Reichen 6 000 000 Deportierte nicht aus, um den Faschismus auszutreiben“. Am späten Nachmittag

Nachrichtagentur Rufe. Der bayerische Innenminister Günther Beckstein (CSU) wies ebenso wie Blüm die Vorwürfe der Scientologen als haltlos zurück. Die Demonstration sei Propaganda, um die Bundesrepublik zu diffamieren. Doch werde die Organisation nicht davon ablenken können, daß sie extremistisch sei, sagte der CSU-Politiker.

Die Demonstranten versammelten sich am Vortag eines Verfahrens vor dem Bundesverwaltungsgericht. Es befaßt sich am heutigen Dienstag damit, ob den Scientologen Gemeinnützigkeit zusteht. Ein Verwaltungsgericht in Baden-Württemberg hatte das verneint. Bestätigt das oberste Gericht das Urteil, müssen gewerbliche Betriebe der Scientologen Umsatzsteuer zahlen und unterliegen dem Tarifrecht.

Das Bundesarbeitsgericht in Kassel bezeichnete 1995 Scientology als Wirtschaftsunternehmen. Es sieht im Auftreten als Glaubensgemeinschaft nur Vorwand. Die Innenministerkonferenz kam 1994 zu dem Schluß, „unter dem Deckmantel einer Religionsgemeinschaft“ verhehle Scientology „Elemente der Wirtschaftskriminalität und des Psychoterror“. Seit dem Sommer beobachtet der Verfassungsschutz die Organisation. In einer Broschüre des Berliner Landesamtes vom September wird Scientology „Moloch“ genannt, „der nicht von Religiosität oder Seelsorge geleitet ist, sondern einzig von der unersättlichen Gier nach Geld und Macht“.

Ein früheres Führungsmittelglied von Scientology, der US-Amerikaner Gerry Armstrong, erhob am Montag in Hamburg schwere Vorwürfe gegen die Organisation und gegen die US-Regierung. Armstrong war nach eigenen Angaben von 1969 bis 1981 Scientology-Mittelglied, unter anderem bei Sea Org, der Eliteneinheit der Organisation. Er habe für den Scientology-Führer Ron Hubbard persönlich gearbeitet.

Scientology beschneide die Rechte der Mitglieder, sagte Armstrong. Er selbst sei nach seinem Austritt überwacht und auch körperlich angegriffen worden. Fünf Verfahren habe die Organisation gegen ihn angestrengt – mit Erfolg. Ein US-Gericht habe ihn dazu verurteilt, nicht mehr über Scientology zu sprechen. In Umerziehungslagern werde versucht, den Willen abtrünniger Mitglieder zu brechen.

Der US-Regierung warf Armstrong vor, gehe nicht mehr gegen die „Freiwill-Praxis“ der Scientologen vor, die die systematische Vernichtung von Feinden vorsehe. Es gebe sichere Hinweise, daß ranghohe Vertreter der US-Regierung und der Wirtschaft Verbindungen zu Scientology hätten oder selbst Mitglieder seien.



Scientologen protestierten am Montag in Berlin gegen angebliche Verfolgung und klagten auf Transparenten „Toleranz“ ein. (Bild: Jockel Finck/ap)

sation zu verfolgen und zu diskriminieren. Ihr Protest richtete sich auch gegen den Entscheidung der Innenminister von Bund und Ländern, Scientology ein Jahr lang vom Verfassungsschutz beobachten zu lassen.

An der Demonstration beteiligten sich nach Angaben der Polizei knapp 3000 Menschen. Die Veranstalter hatten 10 000 erwartet, und sprachen selbst von 5000 Teilnehmern. Ende der vergangenen Woche hatten sich in der Berliner Filiale

marschierten die Teilnehmer zum Brandenburger Tor, wo ein Konzert stattfand. Die angekündigten Hollywood-Stars blieben jedoch aus.

Bundesarbeitsminister Norbert Blüm (CDU) bezeichnete den von Scientology gewählten Vergleich mit der Verfolgung von Juden in der Zeit des Nationalsozialismus als grobe Geschmackslosigkeit. Der Vergleich beleidige nicht nur die Demokratie, sondern auch die Opfer der Nationalsozialisten, sagte Blüm der Rundfunk-

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Newspaper: Frankfurter Rundschau

Tuesday, 28 October 1997

LF DEMONSTRATORS THAN EXPECTED

Scientists protest in Berlin/Ex-Functionary describes persecution of apostates

A former executive member of Scientology, the American Gerry Armstrong, voiced on Monday in Hamburg serious reproaches against the organization and against the US Government. According to his own account, Armstrong was a member of Scientology from 1969 until 1981. Amongst others he has been in the Sea Org, the elite unit of the organization. He would have personally worked for the Scientology-leader Ron Hubbard.

Scientology restricts the rights of its members, says Armstrong. After his resignation he himself has been physically attack and put under surveillance. The organization pursuit him with five legal proceedings - with success. He has been sentenced by an US Court not to talk anymore about Scientology. In camps to un-educate apostates it is being attempted to break their will.

Armstrong accused the US-Government for not taking actions against the "fair game practice" of Scientology which intends the systematic destruction of enemies. There are proven indicators that high-ranking representatives of the US-Government and Economics have connections to Scientology or are even members.

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Opferberichten und Untersuchungsergebnissen nicht viel Neues.
Vom "Extremismus neuen Typs" bei

Scientology sprach die Abgeordnete Renate Rennebach (SPD) von der Enquete-Kommission des Bundestages und rechtfertigte so die staatlichen Massnahmen. "Wenn Organisationen hier auftreten, die die Würde des Menschen verletzen, dann hat der Staat die Pflicht, dies zu untersuchen". Ein Wirtschaftsunternehmen, das im verborgenen arbeitet, versuche "eine öffentliche Religion zu werden", ergänzte Johannes Aargard vom dänischen Dialog Center International aus Aarhus. Scientology sei "ganz und gar Schwindel".

Der Abend machte klar: Die Front der Scientology-Gegner steht. Sie argumentieren damit, die Sekte sei totalitär, "faschistoid", entziehe den Menschen ihre Würde und sei mit allen rechtsstaatlichen Mitteln zu bekämpfen. Das zu zeigen, war denn auch das eigentliche Ziel der internationalen Gemeinschaft auf der Bühne. "Wir wissen, wofür wir stehen", resümierte Ursula Caberta.

Die Gegenseite war indes unauffällig geblieben während der Veranstaltung. Aber dennoch waren sie da, die heimlichen und offenen Scientologen, viele von ihnen aus den Vereinigten Staaten. Nur leise liessen sie ihrer Empörung freien Lauf, hin und wieder sah man ein Kopfschütteln oder ein gequältes Lächeln angesichts dessen, was anklagend vom Podium kam. Zum Saalmikrofon drängte es nicht die Scientologen selbst, sondern ihre Verbündeten: So erhob etwa S.L. Sharma von einer dänischen Hindu-Organisation, die mit Scientology zusammenarbeitet, den Vorwurf, in Deutschland fänden "ethnische Säuberungen" gegenüber religiösen Minderheiten statt. Sein Beitrag wurde vom empört-ungläubigen Raunen des Publikums geschluckt. Draussen vor dem Saal wiederum war Scientology selbst aktiv: Wer die Veranstaltung verliess, bekam schon auf dem Hof ein eifrig zusammengeschustertes Flugblatt in die Hand gedruckt. Während der Scientology-Aussteiger Armstrong im Saal noch interviewt wurde, bezeichnete die Sekte ihn als "psychotische Person" auf der Flucht vor der US-Justiz. Auch Scientology und Co. wissen, wofür sie stehen.

LANGUAGE: GERMAN; DEUTSCH

TYPE: TAZ-Bericht

LOAD-DATE: October 27, 1997

DIE TAGESZEITUNG,
Hamburg, Germany

28 October 1997

Reporter: Matthias Stausberg

WE KNOW WHAT WE STAND FOR

The front of the Scientology opponents is firm: the sect represents dangerous "extremism of a new kind", as was announced at a conference. The Hubbard followers sent in their own ideological help troops.

It was a clear case for Clark Austin. "Very concerned", meaning very concerned. He stated about the suppression of religious faiths in Germany.

No, he is not a Scientologist, more a very convinced Christian, is what the young man from South California expressed. The philosophy of L. Ron Hubbard is something he considered to be quite "batty", but his organization with the rather decorative name Religious Freedom International" is concerned about the rights of all suppressed religious minorities. And Scientology belongs to them. Especially in Germany.

All of them were quite "very concerned", who had come on Sunday evening to the house of the Church in Charlottenburg -- even though the concerned could not have been more controversial. The "parents and concerned initiative against Psychic dependencies and for Spiritual Freedom", in short EBI, had invited victims and opponents of Scientology to a podium discussion and had put up heavy guns for that. Ursula Caberta was there, Chief of the Hamburg Scientology Working Group, and the American Gerry Armstrong, who after thirteen years in the organization had risked the difficult departure. He reported about harrassment which he had suffered from since he had publicly turned against Scientology.

Scientologists were not part of the podium. Thus, in front of the approximately 120 spectators, the big boxing match did not take place, and there were no spectacular pictures for the numerous representatives television teams. Just shortly before the beginning of the event, there was some noise when priest Thomas Gandow from the Evangelical State Church, forbid a Scientology camera team into the house.

Inside the hall, although there was a huge mixture of reports from victims and results from investigations there wasn't much news. Member of Parliament Renate Rennebach

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(SPD) from the Enquete Commission of the Federal Council spoke about the "extremism of the new kind" in Scientology and so justified the State measures. "If there are organizations here who hurt the honor of people, then the state has the duty to investigate this". A business company which operates covertly is trying "to become a public religion", is what Johannas Aagaard from the Danish Dialogue Centre International from Arhus added. Scientology is "through and through a swindle."

The evening was clearcut: the front of the Scientology opponents is firm. They are arguing that the sect is totalitarian, "fascistic", pulls away the honor of people and is to be fought with all legal state measures. To show this was the real purpose of the International community on the stage. Ursula Caberta summed up: "We know what we stand for".

The opposition was however inconspicuous throughout the event. But nonetheless they were there, the covert and overt Scientologists, many of them from the United States. Only quietly did they let out their disagreements, now and then one could see somebody shaking his head, or an enforced smile in view of that which came as a complain from the podium. The Scientologists themselves did not push to get to the microphone but their allies did: S.L. Sharma from a Danish Hindu organization which cooperates with Scientology raised the claim that there are "ethnic cleansings" against religious minorities in Germany. The public swallowed his contribution with frowning comments expressing disbelief. Outside in front of the hall, Scientology became active again: whoever left the event was given a hecticly produced leaflet in the courtyard. While the Scientology dropout Armstrong was still being interviewed in the hall, the sect called him "a psychotic person" whose running away from US justice. Also, Scientology and Co. know what they stand for.

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Newsgroups: alt.religion.scientology
Subject: The Beginning of the End of Endless Black PR
From: armstrong@ntonline.com (gerry armstrong)
Date: Wed, 26 Nov 1997 01:26:56 GMT

Yesterday, November 24 the following complaint was filed on my behalf
in US District Court in Reno, Nevada.

I am in the process of moving to my new digs in the Silver State, but
will be at this address for a few days.

I hope this adds to everyone's (Scientists' and Non
scientologists') reasons for a Happy Thanksgiving.

Gerry

[Quote]

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CV-N-97-00670-HDM (RAM)

GERALD ARMSTRONG,

Plaintiff,

vs.

DAVID MISCAVIGE and CATHY
NORMAN, individuals; CHURCH

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OF SCIENTOLOGY INTERNATIONAL,
a California corporation;
RELIGIOUS TECHNOLOGY CENTER ,
a California corporation; the
SEA ORGANIZATION, a California
based unincorporated entity ;
and the CHURCH OF SCIENTOLOGY
OF TEXAS, a Texas corporation;

Defendants.

COMPLAINT FOR LIBEL AND FOR DEFAMATION AND FOR OTHER RELIEF

JURY DEMAND

Plaintiff, Gerald Armstrong, alleges as follows:

JURISDICTION AND VENUE

1. Subject matter jurisdiction resides in this Court pursuant to 28 U.S.C.A. sec. 1332 as plaintiff is a resident of Nevada, and defendants are residents of California or of Texas.
2. The amount in controversy exceeds Seventy-five Thousand Dollars (\$75,000). exclusive of interest and costs.
3. Venue is laid in this United States District Court (Northern Division) for the District of Nevada pursuant to 28 USCA sec. 1391 (a) and pursuant to Local Rule 1002 (b) (1-2).

NATURE OF THE ACTION

4. Plaintiff, as claims for relief, alleges entitlement to damages caused by defendants' malicious publication and dissemination of false and defamatory statements, as well as claiming damages for defendants' intentional infliction of emotional distress upon him.

PARTIES

5. Plaintiff Gerald Armstrong ("GA", "Armstrong") a resident of Nevada at the time of filing this complaint, from 1969 through 1981 was a devoted and trusted Scientologist. From 1971 through 1981 he was a member of the Sea Organization, the highly dedicated upper echelon and management arm of Scientology.

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For significant portions of that period he dealt directly with Scientology founder L. Ron Hubbard and became intimately familiar with organization policies and practices. Armstrong's last assignment was to maintain and make available to Hubbard's biographer the most personal and revealing Hubbard boyhood-forward lifetime documents. It was in this period that Armstrong discovered the dark side of Scientology's founder, ultimately leading Armstrong to leave the organization.

6. Defendant Church of Scientology International ("CSI") and defendant Religious Technology Center ("RTC") both California corporations, as recently as October 29, 1997 have been found by the California Superior Court of Los Angeles County to be two of the alter ego firm control entities of the full Scientology operations.

7. Defendant Sea Organization ("Sea Org"), an unincorporated California-based entity or association housed in the various business offices of that state's corporate party defendants herein, is the third of the alter ego entities which control Scientology throughout the world.

8. Defendant David Miscavige ("DM", "Miscavige") is the individual who is the present RTC chairman and the highest ranking member of the Sea Org. The Sea Org, on information and belief and upon proofs to be adduced in these proceedings, is "the absolute power center" of the whole "Scientology" establishment said to be located worldwide, including 150 satellite or affiliated entities claimed to exist in the United States. Miscavige sits alone and highest at the very center of "the absolute power center," controlling absolutely by whatever traditional Scientology/Hubbard/Miscavige means are required.

9. Defendant Church of Scientology of Texas ("CST") is a Texas corporation, under the domination and control of the California defendants herein.

10. Defendant Cathy Norman ("Norman") is an employee of CST, and responsible to, receiving orders from, and under the domination and control of, the California defendants herein.

GENERAL ALLEGATIONS

11. Plaintiff does repeat, reallege, adopt, and incorporate by reference as though set out in haec verba herein, each allegation contained in paragraphs 1 through 10 hereinabove.

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12. In 1981 Armstrong became disillusioned because his duties led him to archived papers disclosing critical personal frauds and organization deceptions perpetrated by other Hubbard intimates and by Hubbard himself during his years heading up Scientology. During his archiving activities Armstrong observed that over Hubbard's adult life he used a philosophy of "opportunistic hatred" and the "acts which flow therefrom (lying, cheating, stealing, compromising, entrapping, obstructing, bullying, blackmailing, destroying) as the solution to his problems."

13. In the 1960's Hubbard established this philosophy and practice as policy for the Scientology organization's treatment of people designated as "enemies," and dubbed this policy "fair game." The fair game policy states that "enemies" "may be deprived of property, injured by any means by any Scientologist....may be tricked, sued, or lied to or destroyed."

14. One of Scientology's mechanisms for implementation of fair game against a designated "enemy" is a policy and practice of character assassination, which Hubbard termed "black propaganda" or "black PR." The stated purpose of black PR is to destroy an "enemy's" reputation and credibility or public belief in him by the manufacture and spreading of falsehoods about him.

15. Fair game has been judicially condemned many times. In a landmark California proceeding, Los Angeles Superior Court Judge Paul G. Breckenridge, Jr. in his decision rendered in 1984 in the case of Scientology v. Gerald Armstrong, Case No. C420153, stated in a now haunting declaration:

"In addition to violating and abusing its own members civil rights, the organization over the years with its "Fair Game" doctrine has harassed and abused those persons not in the Church whom it has perceived as enemies. The Organization clearly is schizophrenic and paranoid, and this bizarre combination seems to be a reflection of it founder LRH."

16. In response to such judicial and societal condemnation of its practices, defendants have claimed over the past many years that the fair game doctrine had been "canceled", is "no longer Scientology policy" and "no longer practiced." Defendants claim that the people who were harassing and abusing others were doing so in violation of Hubbard's/organization policy, and as a result were purged from the organization.

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Defendant Miscavige, the present supreme director of all Scientology components, claims that he was personally responsible "for the purge" and "for the elimination of fair game activities."

SPECIFIC ALLEGATIONS

17. Plaintiff does repeat, reallege, adopt, and incorporate by reference herein as though set out in haec verba herein, each allegation contained in paragraphs 1 through 16 hereinabove.

18. The grim truth however -- and notwithstanding the repeated public Miscavige statements, as demonstrated infra -- is that defendants herein have designated Armstrong an "enemy" and have from the time he left Scientology and up to the present subjected him to fair game and a massive international black PR campaign. The document which gives rise to this complaint was created and disseminated by defendant components of the Scientology enterprise pursuant to fair game, and is black propaganda.

19. Rather than deal responsibly with and actually eliminate their antisocial nature and practices as condemned by Judge Breckenridge, defendants have chosen to continue to subject designated "enemies," including Armstrong, to fair game and black PR. In their document which gives rise to this complaint, defendants seek to undermine the validity of Judge Breckenridge's decision by destroying Armstrong's reputation and credibility through the manufacture and dissemination of falsehoods about him. Clear, irrefutable proof is shown immediately hereinafter, that "fair game" and "black propaganda" are very much alive and spreading their frightening and historically contemptible poisons however, whenever, wherever, the Scientology's Miscavige-CSI-RTC-Sea Org cabal dictates.

20. Triggering this complaint: on October 21, 1996 one Cathy Norman caused transmission and publication of a one page letter on the letterhead of the Church of Scientology of Texas, Austin, to Craig Branch, Watchman Fellowship, P.O. Box 530842, Birmingham, Alabama, 35253. This letter showed a "cc: James Walker", thus broadening its publication. Copy by photocopy of the October 21, 1996 Norman-Branch letter marked Armstrong Exhibit A is annexed and incorporated herein.

21. One of the enclosures was an eight page document

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bearing a top line first date of 10-May-1993, followed by a court of law case name in capital letters and the date (emphasis added) June 20, 19_84_, _viz_:

CHURCH OF SCIENTOLOGY OF CALIFORNIA (PLAINTIFF)

vs.

GERALD ARMSTRONG (DEFENDANT)

June 20, 19_84_

22. As will presently be shown by plaintiff's allegations, the first three paragraphs of this May 10, 19_93_ forty-five hundred + word critique by Miscavige-CSI-RTC-Sea Org of a June 20, 19_84_ decision of a State of California Superior Court Judge (Breckenridge) sent on October 21, 19_96_ by a Texas Scientologist loyalist (Cathy Norman) to an Alabama Watchman Fellowship adherent (Craig Branch) capsule what this case is all about. The subject documents reached plaintiff Armstrong in Marin County, California before the month of November, 1996 was over. The first paragraph, including its " headline" (the "defendant" referred to is Gerald Armstrong, plaintiff here), reads:

"FALSEHOOD IN DECISION OF JUDGE BRECKENRIDGE:

"While defendant has asserted various theories of defense, the basic thrust of his testimony is that he did what he did because he believed that his life, physical and mental well being, as well as that of his wife were threatened because the organization was aware of what he knew about the life of LRH. the secret machinations and financial activities of the Church and his dedication to the truth."

23. The second paragraph of Armstrong Exhibit B, including "headline" reads:

"TRUE INFORMATION:

"Los Angeles Superior Court Judge Paul Breckenridge made the above statement as a part of a decision where the Church had sued Armstrong for theft of certain confidential documents from the Church. Far from any "dedication to the truth," Armstrong had boasted of his ability to lie and to forge documents."

24. The third paragraph then continues what can only be described accurately -- if fidelity to the 1970s precepts of L. Ron Hubbard himself is to be maintained -- as a 1993 Miscavige-CSI-RTC-Sea Org dissemination out of California of an archetype, "fair game" implemented "Church of Scientology black

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propaganda document," _viz_ :

"Gerald Armstrong is a former clerk (Note 1) employed by Church of Scientology of California. During the later years of his tenure as an employee of the Church, Armstrong was placed in charge of a huge quantity of documents that belonged to L. Ron Hubbard that contained private and personal information regarding Mr. Hubbard. Part of his duties included research to support the work of an author who had been retained to write an authorized biography of Mr. Hubbard."

(Note 1: The labeling by Miscavige-CSI-RTC-Sea Org of Gerald Armstrong as "a former clerk" reveals another black PR habit of the Scientology people, that of persistently demeaning an "enemy" or adversary. The truth is that the Armstrong positions in the Sea Org actually included these: Ship's Legal Officer, Ship's Public Relations Officer, Ship's Intelligence Officer, L. Ron Hubbard's Deputy External Communications Aide, Deputy Commanding Officer of Hubbard's Household Unit, and L. Ron Hubbard Biography Researcher.)

A copy of the full eight page document, marked Armstrong Exhibit B -- with the 27 paragraphs each bearing an Arabic numeral (thus, 1 through 27) -- is annexed and by such reference is incorporated herein.

25. The two documents, Armstrong Exhibit A and Armstrong Exhibit B, taken together, contain printed paragraphs constituting libel per se. The two documents, taken together, and as they were disseminated and mailed, constitute the malicious and defamatory statements concerning plaintiff Armstrong identified hereinafter. [Note, each "Item__" is keyed to an Armstrong Exhibit B number stamped (as in 1 through 27) on the left hand margin of Exhibit B."] Random partial highlighting of some of the twenty-seven paragraphs support the initial Armstrong claims for relief.

Item 2: "Gerry Armstrong far from being afraid for his life, was actively engaged in secret machinations his own to seize control of the Church...Armstrong has boasted at length of his ability to lie and to forge documents (Note 2)."

(Note 2: As defendants know (or are charged with knowing) Miscavige-CSI-RTC-Sea Org (or at least the latter surely know) the late L. Ron Hubbard, if it suited his purposes,

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unhesitatingly _commanded_ document forgery and/or document alteration, just as he caused to be constructed -- much of it still part of the Hubbard folklore -- many egregiously false aspects of his own life history, accomplishments, and beliefs.

Item 3: "Gerald Armstrong is a former clerk..."

Item 4: "Armstrong. . .left. . .taking with him huge numbers of confidential documents which belonged to Mr. Hubbard or his wife..."

Item 5: "... the Church received evidence that Armstrong had stolen thousands of documents from Archives when he left the Church."

Item 6: "Once the demand...was made, Armstrong turned the stolen documents over ..."

Item 7: "...Church sued Armstrong for conversion, breach of fiduciary duty...and invasion of privacy based on Armstrong's theft of extensive amounts of papers owned by the Church or the Hubbards."

Item 8: "His defense was stricken on four different occasions (Note 3) by three different judges."

(Note 3: This defendants' statement is, simply, not true. The defense of justification, or privilege, was never stricken. The pre-trial judges did not permit the then-defendant Armstrong to depend on the defense of "unclean hands," which would have barred then-plaintiff Scientology from proceeding _in limine_.)

Item 9: "Armstrong and Flynn were ordered to turn all copies of the documents that Armstrong had stolen over to the court. . ."

Item 10: "The Church presented motions to prevent Armstrong from introducing the stolen confidential documents...The Church was completely ambushed in the trial by these documents...the Church had no chance to prepare and put on that evidence before being hit with the documents in trial."

Item 11: "...witnesses...testified...with regard to his alleged justification for stealing the documents."

Item 13: "The Church had proven that Armstrong was guilty of stealing...Judgment, however, was entered in favor of Armstrong, essentially finding that...The only lawsuit that there was to fear was the one that was ultimately filed for return of the stolen documents."

Item 14: "...when he committed these thefts Armstrong...was engineering a plan to infiltrate and take over the Church at the behest of the Criminal Investigation Division of the Internal Revenue Service..."

Item 15: "...the Church obtained permission from the Los Angeles Police Department to conduct undercover surveillance of Armstrong (Note 4)..."

(Note 4: Here, in this Exhibit B, the reader finds Miscavige-CSI-RTC-Sea Org, for whatever Scientology type purpose, not telling the whole (truthful part of) the story. In Item 15, above, the persons in charge untruthfully assert "the Church obtained permission from the Los Angeles Police Department". So too, in the Miscavige Declaration of February 8, 1994 (at page 31, lines 27-28, DM Declaration "under penalty of perjury") Mr. Miscavige swears that: "Armstrong was proven a liar. In a police-sanctioned investigation..." What this head man's patent untruth does not reveal about their "undercover agent", one Eugene M. Ingram, the opinion of no less a public figure than the Chief of Police, Los Angeles, in the annexed Armstrong Exhibit E reveals (emphasis supplied) that: the letter is believed "to have been drafted by Ingram himself," and that "The Los Angeles Police Department _has not_ cooperated with Eugene Ingram. _It will be a cold day in hell when we do_."

Item 17: "...his justification defense...was completely bogus..."

Item 25: "The Court of Appeal upheld Breckenridge's decision on the legal technicality that it believed a justification defense is available to defend against theft in California."

Item 27: "The Church recently sued Armstrong for his blatant disregard of his obligations under the settlement agreement...another Superior Court Judge was not impressed and slapped Armstrong (Note 5) with a preliminary injunction."

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(Note 5: While defendants CSI-Miscavige et al choose to exult for a moment over issuance of a preliminary restraining order, plaintiff suggests that unaccustomed Scientology candor would at this point have less triumphantly revealed the other half of this "good news, bad news" vignette, viz, Judge Sohigian, while granting a narrow part of Scientology's requested injunction also stated that:

"[Scientology] involves abusing people who are weak... involves techniques of coercion. . . [there is] a very, very substantial deviation between [Scientology's] conduct and standards of ordinary, courteous conduct and standards of ordinary, honest behavior. . . [when dealing with Scientology] be sure you cut the deck... make sure to count all the chips."

26. Plaintiff, upon learning of the existence of the subject libelous materials, called their existence to the attention of his undersigned counsel in Nevada attorney George Abbott. After lengthy Armstrong-Abbott discussion, the two agreed to make demand of and afford written opportunity for publication of full retraction by Ms. Norman, as well as by defendants CSI, RTC and Miscavige.

27. Prior to making demand for retraction, plaintiff and his legal counsel had concluded that the transparently provable facts constitute clear evidence that "fair game" and black PR" has pursued Gerry Armstrong up to today -- whatever misstated history and facts Scientology's all-powerful David Miscavige has chosen to rewrite. A photocopy of the letter sent to defendant Cathy Norman, with copies to CSI, RTC and Miscavige and dated February 12, 1997 is annexed hereto as Armstrong Exhibit C, and incorporated herein.

28. The only response to the Norman-CSI-RTC-Miscavige directed letters came from one attorney Andrew Wilson, whose opening statement declared that "[t]his firm represents Church of Scientology International ("CSI") in the referenced matter and has been asked to respond to your letter," and who rejected plaintiff's demand for retraction out of hand. A photocopy of the letter received from Mr. Wilson and dated February 25, 1997 is annexed hereto as Armstrong Exhibit D, and incorporated herein.

29. Plaintiff does repeat, reallege, adopt, and incorporate by reference herein as though set out in haec verba herein, each allegation contained in paragraphs 1 through 28

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hereinabove.

FIRST CLAIM FOR RELIEF

30. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 1 Armstrong had stolen Scientology's and Hubbard's documents (Exhibit B, paras.5,6,7,8,9,10,11, 13,14,18)

This statement by defendants concerning plaintiff is false and libel per se.

SECOND CLAIM FOR RELIEF

31. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 2 Armstrong's defense of justification in his 1984 trial because of his fear of attacks by Scientology was a total farce, completely bogus, a fraud, and a fraudulent sabotage (Exhibit B, paras. 2,14,17,20)

This statement by defendants concerning plaintiff is false and libel per se.

THIRD CLAIM FOR RELIEF

32. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 3 Scientology was ambushed by Armstrong and his attorney at trial and had no chance to prepare and put on evidence (Exhibit B, paras. 10,12)

This statement by defendants concerning plaintiff is false and libel per se.

FOURTH CLAIM FOR RELIEF

33. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

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Falsehood 4 Armstrong wanted to seize control of Scientology
(Exhibit B, paras. 2,14,16)

This statement by defendants concerning plaintiff is false and
libel per se.

FIFTH CLAIM FOR RELIEF

34. On all of the foregoing allegations and pursuant
to applicable law plaintiff does claim damages in an amount to be
established upon proofs to be adduced and does set out the
damaging words:

Falsehood 5 Armstrong sought to recruit dissident
Scientologists to overthrow the organization
(Exhibit B, paras. 15,16)

This statement by defendants concerning plaintiff is false and
libel per se.

SIXTH CLAIM FOR RELIEF

35. On all of the foregoing allegations and pursuant
to applicable law plaintiff does claim damages in an amount to be
established upon proofs to be adduced and does set out the
damaging words:

Falsehood 6 The Los Angeles Police Department granted
Scientology permission to conduct undercover
surveillance of Armstrong (Exhibit B, para. 15)

This statement by defendants concerning plaintiff is false and
libel per se.

SEVENTH CLAIM FOR RELIEF

36. On all of the foregoing allegations and pursuant
to applicable law plaintiff does claim damages in an amount to be
established upon proofs to be adduced and does set out the
damaging words:

Falsehood 7 Armstrong created a plan to plant forged and
incriminating documents in Scientology files to be
found in a raid by the Internal Revenue Service
(Exhibit B, paras. 16,19)

This statement by defendants concerning plaintiff is false and
libel per se.

EIGHTH CLAIM FOR RELIEF

37. On all of the foregoing allegations and pursuant
to applicable law plaintiff does claim damages in an amount to be

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established upon proofs to be adduced and does set out the damaging words:

Falsehood 8 Armstrong stated that neither truth nor good faith play any significant role in litigation (Exhibit B, para. 21)

This statement by defendants concerning plaintiff is false and libel per se.

NINTH CLAIM FOR RELIEF

38. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 9 Armstrong stated that facts mean nothing to a civil litigant and that truth is merely an avoidable obstacle (Exhibit B, para. 21)

This statement by defendants concerning plaintiff is false and libel per se.

TENTH CLAIM FOR RELIEF

39. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 10 Armstrong boasted at length of his ability to lie and to forge documents (Exhibit B, para. 2)

This statement by defendants concerning plaintiff is false and libel per se.

ELEVENTH CLAIM FOR RELIEF

40. On all of the foregoing allegations and pursuant to applicable law plaintiff does claim damages in an amount to be established upon proofs to be adduced and does set out the damaging words:

Falsehood 11 The evidence shows Armstrong's state of mind to be of a calculating, aggressive and dishonest character (Exhibit B, para. 24)

This statement by defendants concerning plaintiff is false and libel per se.

41. The above falsehoods were known by defendants to be false and were manufactured and disseminated by defendants maliciously with the intention of causing plaintiff to be

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mistrusted, reviled, shunned, humiliated and further attacked, and as a result of defendants' manufacture and dissemination of the above falsehoods plaintiff was mistrusted, reviled, shunned, humiliated and further attacked.

42. Separately and together, these falsehoods, supra, were calculated to cause great injury to plaintiff's reputation, credibility and character.

43. Plaintiff has always enjoyed a good reputation for honesty, truthfulness and uprightness of character. Judge Breckenridge in his 1984 decision stated regarding plaintiff that "he did what he did, because ... [of] his dedication to the truth;" and that his "testimony [was] credible, extremely persuasive."

44. The calculated, willful, reckless, and harmful mistreatment -- with resulting physical, mental, and economic damages -- exemplified by the allegations of each of the foregoing eleven claims for relief, directly caused the injuries to plaintiff's person alleged in the hereinafter alleged Twelfth Claim for Relief.

TWELFTH CLAIM FOR RELIEF
(Intentional Infliction of Emotional Distress)

45. Plaintiff does repeat, reallege, adopt, and incorporate by reference as though set out in haec verba herein, each allegation contained in paragraphs 1 through 44 hereinabove.

46. Plaintiff, for a twelfth claim for relief does allege that for more than fifteen years defendant David Miscavige -- individually, and in concert with a handful of societal kin, with others making up an all-powerful "Scientology" cabal -- has been engaged in a relentless, never-interrupted course of conduct designed to destroy plaintiff Gerald Armstrong.

47. The methods of destruction at hand were those approved, indeed in no small part invented by the now deceased L. Ron Hubbard. Central to the chosen means were the "fair game" and "black propaganda" techniques and practices described hereinabove. Defendant Miscavige was not above indulging in false, wholly untrue, harmful and spiteful, even inhumane, statements, including even those "under penalty of perjury", as exemplified by the exposition of Miscavige sworn and unsworn public statements to the light of truth. supra. As two examples

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of this defendant's willingness to be untruthful, the complaint specifically identifies DM's "sworn under penalty of perjury" declarations embracing the much-vaunted Miscavige insistence that "early on, I ended fair game, once and for all"; so too, the Miscavige flat out claim an "undercover agent" was "sanctioned" by the Los Angeles Police Department, a claim proven to be a lie. See Armstrong Exhibit E.

48. A search by plaintiff through discovery will be needed to confirm (or to deny) the many and diverse rumors afloat regarding the degree of "fair game" and "black propaganda" directed at Armstrong over the past fifteen year period and currently.

49. Meantime plaintiff alleges unbridled misconduct -- by defendant Miscavige, and/or under his control and direction, and/or within his knowledge and acquiescence at all times, all within the purview of the defendants and each of them -- which conduct has been and is, designed to inflict nonstop severe and grossly damaging emotional distress.

50. (a) By means of the premises herein established, these defendants and each of them have unlawfully and maliciously caused plaintiff to become greatly vexed, harassed, and injured, have caused him to suffer great mental and nervous strain, and caused his feelings to be hurt.

(b) Defendants' misconduct has also caused plaintiff to be exposed to, and to have suffered, intended or actual public and institutional (e.g. Watchman Fellowship) hatred, contempt, and obloquy, all constituting misconduct designed to deprive him of public confidence and social intercourse in the communities in which he has resided or where he has sojourned.

(c) The actions of defendants designed to destroy plaintiff -- embracing "destruction" in all its forms, literally, physically, psychically, mentally, in his livelihood, in ordinary senses of well being, through every form of intentional infliction of emotional distress -- in compensatory damages in amount upon proofs to be adduced but estimated to exceed \$900,000 from and after May 10, 1993. On said premises, and by reason of the aforesaid acts of defendants, plaintiff has sustained serious actual damages, in an amount to proven at trial, but no less than the minimum jurisdictional amount for this Court.

TRIAL OF THIS MATTER BEFORE A JURY IS DEMANDED.

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WHEREFORE, plaintiff prays for damages against all defendants, jointly and severally, as follows:

ON ALL TWELVE CLAIMS FOR RELIEF ABOVE SET OUT

1. For general damages according to proof at trial.
2. For special damages according to proof at trial.
3. For costs of suit.
4. For punitive damages; and
5. For such other relief as the Court may deem just.

Dated: Minden, Nevada
November 21, 1997,

Respectfully submitted,

GEORGE W. ABBOTT, CHARTERED

George W. Abbott

STATE OF NEVADA)

: ss.

COUNTY OF DOUGLAS)

GERALD ARMSTRONG, under penalty of perjury, makes the following assertions:

He is the plaintiff in the above-entitled action; that he has read the foregoing Complaint for Libel and for Defamation, and for Other Relief and knows the contents thereof; that the same is true of his own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, he believes it to be true.

Gerald Armstrong

Subscribed and sworn to before

me this 21st day of November, 1997.

Notary Public

[End Quote]

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ANDREW H. WILSON

WILSON CAMPILONGO LL

115 SANSOME STREET, SUITE 400
SAN FRANCISCO, CALIFORNIA 94104
(415) 391-3900
TELECOPY (415) 954-0938

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TO: Gerald Armstrong

DATE: December 1, 1997

FROM: Andrew H. Wilson, Esq.

TELEPHONE: (702) 782-8362

NOTE: Please see the attached letter.

Total Number of Pages (including cover letter): 2

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ANDREW H. WILSON

WILSON CAMPILONGO LLP

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November 27, 1997

VIA FACSIMILE TO (702) 782-8362

Mr. Gerald Armstrong
2245-B Meridian Blvd.
P.O. Box 98
Minden, Nevada 894234-0098

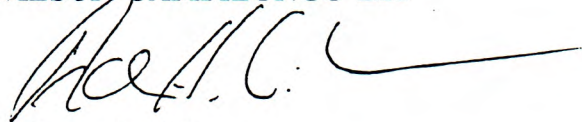
Re: Ex Parte Appearance for OSC re contempt
Our File No. SCI02-003

Dear Mr. Armstrong:

I write to apprise you that I shall appear December 2 at 9:30 a.m. before the Hon. Gary Thomas in Courtroom H of the Marin County Superior Court to seek an order to show cause re contempt arising out of your recent actions in creating and publishing certain documentary works over the internet, in granting interviews to various English and German media and other actions taken by you while in Germany.

Very truly yours,

WILSON CAMPILONGO LLP



Andrew H. Wilson

AHW-3047.LTR:kns

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T.

Andrew H. Wilson
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San Francisco, California 94104
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6255 Sunset Boulevard
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(213) 661-4030

Attorneys for Plaintiff
CHURCH OF SCIENTOLOGY INTERNATIONAL

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY)	Case No. 152229
INTERNATIONAL, a California)	
not-for-profit religious)	ORDER TO SHOW CAUSE
corporation;)	RE CONTEMPT
)	(CCP §1212)
Plaintiff,)	
)	
vs.)	
)	
GERALD ARMSTRONG; DOES 1)	
through 25, inclusive,)	
)	
Defendants.)	

TO: GERALD ARMSTRONG, DEFENDANT :

YOU ARE HEREBY ORDERED to appear on Jun 30, 1998 at
9:30 o'clock A.m., in Courtroom H of the above-entitled court
located at the Hall of Justice, San Rafael, California, then and
there to show cause, if any you have, why you should not be adjudged
in contempt of court and punished accordingly for willfully
disobeying the order of this court made on October 17, 1995 in the
above entitled action.

The order of October 17, 1995 and your disobedience thereto are
more particularly described in the EX PARTE APPLICATION FOR ORDER TO

1 SHOW CAUSE WHY DEFENDANT GERALD ARMSTRONG SHOULD NOT BE HELD IN
2 CONTEMPT; MEMORANDUM OF POINTS AND AUTHORITIES and DECLARATION OF
3 ANDREW H. WILSON which are attached hereto and made a part hereof.

4 Pursuant to Code of Civil Procedure §415.50, as soon as
5 practicable, this Order to Show Cause Re Contempt shall be served on
6 Defendant Gerald Armstrong ("Armstrong") by publication in the
7 Independent Journal, once a week for 4 weeks. In addition, said
8 papers shall be served on Armstrong by First Class Regular Mail at
9 the following address: Gerald Armstrong, 2245-B Meridian Blvd.,
10 P.O. Box 98, Minden, Nevada 89423-0098.

11
12 DATED: Dec 2nd, 1997.

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14 Gary W. Thomas
JUDGE OF THE SUPERIOR COURT

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

7499

Date: July 29, 1994

Honorable	DIANE WAYNE	, Judge	I.R. MATTHEWS-DOTY	, Deputy Clerk
<i>12</i>	NONE	, Deputy Sheriff	NONE	, E.R.M.

BC052395

(Parties and Counsel checked if present)

CHURCH OF SCIENTOLOGY INTERNATIONAL,
ETC., ET ALCounsel For
Plaintiff

VS

no appearances

GERALD ARMSTRONG, ET AL

Counsel For
Defendant

NATURE OF PROCEEDINGS:

RECEIVED

RULING ON MATTER TAKEN UNDER SUBMISSION JULY 28, 1994

AUG 03 1994

HUB LAW OFFICES

The Court, on 7-28-94, having taken plaintiff's OSC re contempt under submission now rules as follows on the matter submitted:

OSC for Contempt: Deny

This court finds that there was a valid order issued on May 28, 1992 (hereinafter referred to as the "Order") pursuant to the opinion of the Court of Appeals, Second Appellate District, May 16, 1994. Pursuant to stipulation the defendant was properly served with the order and had the ability to comply with the order.

The request for contempt concerns three areas of activity alleged to have been engaged in by the Respondent; (1) the Aznaran, litigation, (2) the Wollersheim litigation; and (3) the Roberts litigation. This court finds that Moving Party had not demonstrated beyond a reasonable doubt that the Responding Party has violated the Order.

1. The Aznaran Litigation

Moving party argues that based on deposition testimony of Respondent (Ex. 14), he has violated the Order by assisting in a lawsuit against the Church of Scientology prosecuted by the Aznarans. In that testimony taken on October 8, 1992 Respondent indicates that he had conversations with the Aznarans regarding their case after the date of the Order.

However, nowhere is it suggested that any of those conversations were for the purposes of "assisting" in their claims. And, it appears that any such conversation could have been associated with his ministerial duties as a paralegal in the office of his employer. It should be noted that the Order specifically permits Respondent to engage in such employment and does not "wall" him off from all such litigation.

SUPERIOR COURT OF CALIFORNIA , COUNTY OF LOS ANGELES

7500

Date: July 29, 1994

Honorable DIANE WAYNE

, Judge

I.R. MATTHEWS-DOTY

, Deputy Clerk

#2b NONE

, Deputy Sheriff

NONE

, E.R.M.

BC052395

(Parties and Counsel checked if present)

CHURCH OF SCIENTOLOGY INTERNATIONAL,
ETC., ET ALCounsel For
Plaintiff

VS

no appearances

GERALD ARMSTRONG, ET AL

Counsel For
Defendant

NATURE OF PROCEEDINGS:

Laurie Bartilson, an attorney for Moving Party, also testified that in July 1992 she received a telephone call from Respondent in relation to a Change of Venue order in the Aznaran litigation. She testified that during that conversation Respondent indicated that he was assisting the Aznarans in the litigation. However, court documents conclusively demonstrate that the venue order was not granted until August 28, 1992 suggesting that her recollection of the conversation was flawed.

2. The Wollersheim Litigation

Moving party argues that the affidavit submitted in the Wollersheim litigation violated the Order. Ex. 19. Clearly it would be impermissible for Respondent to have participated in that litigation if Wollersheim had been the prosecuting party. However, in the litigation in which the affidavit was used, the Church of Scientology was the plaintiff and Wollersheim was the defendant. This did not violated the prohibition of assisting in a claim "against" the church.

3. The Roberts Litigation

As demonstrated by Ex. 11 and 12 Respondent participated in the Roberts litigation to the extent that he executed two proofs of service in that matter. Such conduct was ministerial in nature and does not violate the prohibition against assisting in litigation.

Moving party also suggests that the Order was violated by conversations Respondent had with Roberts regarding his case. Ex. 8 and the deposition of October 8, 1992. However, it appears that those conversations took place prior to the Order.

And finally, when read in its totality, the letter of December 22, 1992 (Ex.9) does not amount to activity which "assists" in litigation on behalf of Roberts.

SUPERIOR COURT OF CALIFORNIA , COUNTY OF LOS ANGELES

7501

Date: July 29, 1994

Honorable	DIANE WAYNE	Judge	I.R. MATTHEWS-DOTY	, Deputy Clerk
12c	NONE	, Deputy Sheriff	NONE	, E.R.M.

BC052395

(Parties and Counsel checked if present)

CHURCH OF SCIENTOLOGY INTERNATIONAL,
ETC., ET ALCounsel For
Plaintiff

VS

no appearances

GERALD ARMSTRONG, ET AL

Counsel For
Defendant

NATURE OF PROCEEDINGS:

The OSC and the Citee, Gerald Armstrong, are discharged.

A copy of this minute order is sent to counsel appearing 7-28-94 via U.S. Mail addressed as follows:

MICHAEL L. HERTZBERG, ESQ.
740 BROADWAY
5TH FLOOR
NEW YORK CITY, N.Y.
10003ANDREW H. WILSON, ESQ.
235 MONTGOMERY STREET
STE. 450
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<http://www.freedom.org.uk/mag/issuea03/page00.htm>

That vacation was found to consist of a series of interviews, including discussions with former Church members expelled for their misdeeds, and long ago exposed in a plot to extort money from the Church (see Secret Lies,). Among them: Gerry Armstrong, a fugitive from justice in the United States, seeking to avoid a jail cell after he was found in contempt of court for spreading lies about Mr. Hubbard and the Church. He owes the Church hundreds of thousands of dollars for grievous violations of court orders. This is the same man who was captured on video boasting of his ability to falsify "I can create documents with relative ease. I used to do it for a living. ... Just f...ing allege it. What's more, rather than contacting the Church or seeing Church facilities while in Los Angeles, she travelled to Canada, where this source was hiding out from U.S. law enforcement.

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Subject: Re: About the "truce"

From: ronsamigo@aol.com (RonsAmigo)

Date: Fri, Dec 19, 1997 14:57 EST

Message-id: <19971219195701.OAA01472@ladder02.news.aol.com>

Rod Keller wrote:

>Why are the Scientologists simultaneously offering a truce? I'm thinking
>it's a little test, to see if we are all completely unreasonable or if
>there are some who will listen to "reason". Or perhaps a PR stunt to claim
>we don't respect Christmas in some Freedom Magazine article.

>But what I find so interesting is that they come up with these ideas in
>synch with each other. One day last week, they all decided that critics
>are being paid to post here, or paid to picket. AOL folks suddenly decided
>that, OSA shills came to that realization at the same moment. All together
>now, we'll give you your opinions for this week.

Nothing is as it seems, is it, Keller. A Scientologist offers a "truce" and you assume it is part of some coordinated "OSA shill" program. Did you even for a moment think that just maybe that person was acting as an individual and trying to forward the spirit of Christmas? Of course not. You know better. You "know" that Scientologists are sub-human and incapable of such thoughts.

I am truly disgusted by the bigoted mindset displayed by several of you critics in response to the idea of a Christmass truce. Do you guys derive ALL of your sense of self-worth through your anti-Scientology activities? Is that what it is? Does considering even *one* Scientologist as more than sub-human so threaten your justifications for your continued blind bigotry?

Why is it okay for you to devote so much of your time attacking a people and a religion about which you know practically nothing? (and believe me that IS the case) I believe the primary motivation for the majority of ARS "critics" is simple blind bigotry. They are so imprisoned by their own fixed ideas that they are virtual slaves to their own ignorance. They are incapable of seeing anything but bad in Scientology and Scientologists. And anything that they do to a Scientologist or Scientology is a triumph and fully justified. Of course anything a Scientologist or Scientology do to them is an atrocity of magnitude.

Well, the hell with all of you. Because you have such little traffic with reason and sanity, I see no good coming from trying to reason with you. The idea that there is anything good about Scientology so threatens you that you can not even consider or view well-intended communication directed your way.

Minton's dead cat threat is evidence of the bigot mindset. Even though there is NO evidence of any kind to support the allegation that a dead cat was placed on Minton's doorstep by Scientologists, most of you bastards embrace the idea as almost gospel with 70 plus responses on the thread. You just *know* this is the kind of thing Scientology does and that is proof enough for you. And that "know" is at the heart of your bigotry. Rather than seek any real understanding

of Scientology and Scientologists you only seek further proof
t your fixed ideas and blind bigotry are sane. And a dead
turning up on somebody's doorstep is proof enough that
you are indeed acting in a rational manner when you devote
your time attacking my friends and my religion.

Yeh, I know. It's not the individual Scientologists you think
you are attacking. It is the "organization." Well you can give that
one a rest too because it is pure crap.

I believe that the only correct response to the ARS bigot brigade
is all out attack. I believe that by any and all legal means the battle
should be brought to the front door of those *individuals* who take
joy in harrassing me, my friends and my Church. I don't give a
damn if they think or honestly believe that they are engaged in
some noble endeavor of just cause. If resources aren't available
for this purpose, they should be made available. Scientologists as a
rule are passionate about defending their Church from this kind of
rabble. I don't see any reason why there should be any scarcity of
resources on these lines.

It is not time for a "truce." It is time to take the gloves off and rather
than just engage in a few token moves like picketing a few of the
bigot's homes, it is time for an all out attack on those who as an
avocation or vocation seek to destroy my religion.

*migo

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December 16, 1997

Andrew Wilson, Esquire
Wilson Campilongo LLP
115 Sansome Street, Suite 400
San Francisco, California 94104

By Fax (415)954-~~8888~~
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Dear Mr. Wilson:

As promised in my voice mail message left for you, and my post to ARS December 4 for Scientology, I am today in the office of George Abbott, attorney for me in the Armstrong v. Miscavige, USDC Nevada case, and I am available for your agents to serve me with whatever documents you and your clients desire.

Please have your agents call this office to confirm a time when we can meet.

Also if you have any questions, please call yourself. And have a Merry Christmas.

Yours sincerely,

Gerry Armstrong
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